

## SOIL REMEDIATION

In June of 1994, an environmental audit of The United States Playing Card Company's facility was conducted by Environmental Resources Management, Inc. (ERM).

One area of concern was possible soil contamination from four different sources.

**Area 1** - Three underground storage tanks removed in April, 1988, prior to the regulations that require soil sampling to determine absence of contamination. Tanks contained kerosene, mineral spirits, and turpentine.

**Action:** Soil samples were taken in area where tanks were buried, at various depths by a Geo-Probe. Analysis showed no signs of contamination.

**Area 2** - Hazardous waste drum storage located in an unprotected area from the weather. All drums were properly disposed of, but no soil analysis was conducted.

**Action:** Soil samples were taken in a grid pattern over where drums were stored. Analysis showed no signs of contamination.

**Area 3** - Report stated a PCB - contaminated transformer had a very slight leak at the bottom of unit. Oil had stained the concrete pad and that there was very old PBC oil on the ground.

**Action:** Soil sampling revealed PCB contaminated soil. A grid pattern of core samples were taken until clean samples were obtained. Approximately 20 tons of soil was removed and properly disposed of.

**Area 4** - Report stated possible soil contamination from a solvent spray shed located outside. The concrete pad the booth sat on was stained, and some of the surrounding soil and grass were stained.

**Action:** Soil sampling revealed VOC contaminated soil. A grid pattern of core samples were taken until clean samples were obtained. Approximately 15 tons of soil was removed and properly disposed of.



## DIVISION OF PUBLIC DRINKING WATER

## VOC Sample Submission Report

Sample # 84484-84485

Return Completed Report To:

Ohio EPA, Division of Public Drinking Water  
1800 WaterMark Dr.  
P.O. Box 1049  
Columbus, Ohio 43266-0149

Laboratory Name: VET Midwest, Inc.Certification Number: (47) 4 0 7 4 (51)Sample Number: (52) 1 1 1 6 0 (61)Analyst: Neal McCallDate Received: 06/05/91 Date Reported: (27) 0 5 1 7 9 1 (32)

## Sample Identification

PWS ID: (1) 3 1 3 5 7 1 2 (7)Water Supply Name: U.S. Playing Card Co.Address: Beech & Park AvenuesCity & Zip: Cincinnati, OH 45212County: Hamilton Phone: (513) 396-5700

Sample Date: Month 0 6 Day 0 4 Year 9 1  
Time (Use Military Time): Hour 0 9 Minute 4 5

Sample Collected By: John ConlonSample Location: U.S. Playing Card Co.Additional Information — Analyst Remarks — Non Routine Analytical Requests Beech & Park Aves.

☐ CuSO<sub>4</sub> + H<sub>3</sub>PO<sub>4</sub> ☐ Iced ☐ H<sub>2</sub>SO<sub>4</sub> ☐ NaOH ☐ HNO<sub>3</sub> ☐ Na<sub>2</sub>O<sub>3</sub>S<sub>2</sub>  
☒ Other (Explain) w/ HCl

<input type="checkbox"/> Sample Type (Raw-R, Plant-P, Dist-D)	2	<input type="checkbox"/> Chloroethane, Total ug/l	2216, <0.5
<input type="checkbox"/> Sample Type (Check-C, Special-S)		<input type="checkbox"/> 1,3-Dichloropropene, Total ug/l	2413, <0.5
<input type="checkbox"/> Well Identification		<input type="checkbox"/> Hexachlorobutadiene, Total ug/l	2246, <0.5
<input type="checkbox"/> Trichloroethylene, Total ug/l	2984, <0.5	<input type="checkbox"/> Naphthalene, Total ug/l	2248, <0.5
<input type="checkbox"/> Benzene, Total ug/l	2990, <0.5	<input type="checkbox"/> tert-Butylbenzene, Total ug/l	2426, <0.5
<input type="checkbox"/> Carbon Tetrachloride, Total ug/l	2982, <0.5	<input type="checkbox"/> o-Isopropyltoluene, Total ug/l	2030, <0.5
<input type="checkbox"/> 1,2-Dichloroethane, Total ug/l	2980, <0.5	<input type="checkbox"/> Dichloromethane, Total ug/l	2964, <0.5
<input type="checkbox"/> Vinyl Chloride, Total ug/l	2976, <0.5	<input type="checkbox"/> Fluorotrichloromethane, Total ug/l	2218, <0.5
<input type="checkbox"/> 1,1-Dichloroethylene, Total ug/l	2977, <0.5	<input type="checkbox"/> sec-Butylbenzene, Total ug/l	2428, <0.5
<input type="checkbox"/> 1,1,1-Trichloroethane, Total ug/l	2981, <0.5	<input type="checkbox"/> 1,1-Dichloroethane, Total ug/l	2978, <0.5
<input type="checkbox"/> p-Dichlorobenzene, Total ug/l	2969, <0.5	<input type="checkbox"/> Ethylbenzene, Total ug/l	2992, <0.5
<input type="checkbox"/> CIS-1,2-Dichloroethylene, Total ug/l	2380, <0.5	<input type="checkbox"/> Bromobenzene, Total ug/l	2993, <0.5
<input type="checkbox"/> Tetrachloroethylene, Total ug/l	2987, <0.5	<input type="checkbox"/> Isopropylbenzene, Total ug/l	2994, <0.5
<input type="checkbox"/> o-Dichlorobenzene, Total ug/l	2968, <0.5	<input type="checkbox"/> m-Xylene, Total ug/l	2995, <0.5
<input type="checkbox"/> 1,2-Dibromo-3-Chloropropane, Total ug/l	2931, <0.5	<input type="checkbox"/> o-Xylene, Total ug/l	2997, <0.5
<input type="checkbox"/> TRANS-1,2-Dichloroethylene, Total ug/l	2979, <0.5	<input type="checkbox"/> p-Xylene, Total ug/l	2962, <0.5
<input type="checkbox"/> Monochlorobenzene, Total ug/l	2989, <0.5	<input type="checkbox"/> n-Propylbenzene, Total ug/l	2998, <0.5
<input type="checkbox"/> 1,2-Dibromoethane (EDB), Total ug/l	2946, <0.5	<input type="checkbox"/> o-Chlorotoluene, Total ug/l	2965, <0.5
<input type="checkbox"/> Styrene, Total ug/l	2996, <0.5	<input type="checkbox"/> p-Chlorotoluene, Total ug/l	2966, <0.5
<input type="checkbox"/> Toluene, Total ug/l	2991, <0.5	<input type="checkbox"/> m-Dichlorobenzene, Total ug/l	2967, <0.5
<input type="checkbox"/> Total Xylene, Total ug/l	2955, <0.5	<input type="checkbox"/> 1,2,3-Trichlorobenzene, Total ug/l	2420, <0.5
<input type="checkbox"/> Chloroform, Total ug/l	2941, <0.5	<input type="checkbox"/> 1,2,4-Trimethylbenzene, Total ug/l	2418, <0.5
<input type="checkbox"/> Bromoform, Total ug/l	2942, <0.5	<input type="checkbox"/> n-Butylbenzene, Total ug/l	2422, <0.5
<input type="checkbox"/> Bromodichloromethane, Total ug/l	2943, <0.5	<input type="checkbox"/> 1,3,5-Trimethylbenzene, Total ug/l	2424, <0.5
<input type="checkbox"/> Dibromochloromethane, Total ug/l	2944, <0.5	<input type="checkbox"/> 1,2,4-Trichlorobenzene, Total ug/l	2378, <0.5
<input type="checkbox"/> 2,2-Dichloropropane, Total ug/l	2416, <0.5		
<input type="checkbox"/> Dichlorodifluoromethane, Total ug/l	2212, <0.5		
<input type="checkbox"/> Dibromomethane, Total ug/l	2408, <0.5		
<input type="checkbox"/> 1,3-Dichloropropane, Total ug/l	2412, <0.5		
<input type="checkbox"/> Chloromethane, Total ug/l	2210, <0.5		
<input type="checkbox"/> Bromomethane, Total ug/l	2214, <0.5		
<input type="checkbox"/> Bromochloromethane, Total ug/l	2430, <0.5		
<input type="checkbox"/> 1,2,3-Trichloropropane, Total ug/l	2414, <0.5		
<input type="checkbox"/> 1,2-Dichloropropane, Total ug/l	2983, <0.5		
<input type="checkbox"/> 1,1,2-Trichloroethane, Total ug/l	2985, <0.5		
<input type="checkbox"/> 1,1,1,2-Tetrachloroethane, Total ug/l	2986, <0.5		
<input type="checkbox"/> 1,1,2,2-Tetrachloroethane, Total ug/l	2988, <0.5		
<input type="checkbox"/> 1,1-Dichloropropene, Total ug/l	2410, <0.5		

William Martin

**EXHIBIT 21**

**USTs**



**MVM**  
Maintenance Contractors

The U.S. Playing Card Company  
Beech Street At Park Avenue  
Cincinnati, Ohio 45212

July 13, 1989

ATTN: Bill Martin

RE: Tank Removal  
P.O. #9420  
Invoice #18674

Dear Mr. Martin:

Per our invoice #18674, M V M, Inc. was at your Beech Street location from April 21, 1988 through April 28, 1988.

We excavated and removed one (1) 1,000 gallon; two (2) 500 gallon and one (1) 300 gallon underground steel tanks.

The tanks were backfilled with clean sand. The tanks were pumped down to 1" to 2" of product. We removed 60 gallon total of product which we hauled to our holding tank which was pumped out by Keenan Oil. The removal of these tanks complied with the standards in effect at that time. Upon removal we visually inspected the excavation for contamination. During removal we did not detect significant odors nor did we see any disturbing soil discoloration.

It is our opinion that the tanks and piping were intact at the time of removal. We did not feel that any remediation was called for at that time.

Sincerely,

M V M, INC.

Randy Clark  
Sales Manager

RC/dp



## The United States Playing Card Company

Beech Street at Park Avenue / Cincinnati, Ohio 45212 / (513) 396-5700

December 19, 1988

Mr. William A. Hennosy  
State Fire Marshal  
Bureau of Underground Storage Tank Regulations  
P.O. Box 525  
Reynoldsburg, Ohio 43068-3395

Dear Sir:

This letter is to inform you that The United States Playing Card Company is exempt from filing for a permit for underground storage tanks.

The United States Playing Card Company has one 2,000 gallon underground storage tank that is used to store isopropyl alcohol (C.A.S. No. 67-63-0). The alcohol is manufactured using the strong acid process, and according to list of list, section 304, it is not a regulated chemical. "The registration requirements apply to underground storage tanks that contain regulated substances." Quoted from Fire Marshal's Newsletter, special underground tank edition. This material is exempt from U.S.T.S. regulations.

If you have any questions concerning this matter, please contact me.

Sincerely,

William J. Martin  
Safety Engineer

WJM:pw

Attachments

cc: C. R. Zunk  
A. L. Thomas  
File



## Ohio Department of Commerce

Richard F. Celeste, Governor

Division of State Fire Marshal • Bureau of Underground Storage Tank Regulations  
7510 E. Main St., P.O. Box 525 • Reynoldsburg, OH 43068-3395 • (614) 752-8200

Linda K. Page, Director

December 7, 1989

William Martin  
The United States Playing Card Company  
Beech Street at Park Avenue  
Cincinnati, OH 45212

Dear Mr. Martin:

Our office is sending your company's closure report to the Ohio Environmental Protection Agency (OEPA), Emergency Response Section for review.

The substance that was stored in the Underground Storage Tank(s) are not regulated by our office.

Your contact person at OEPA is Tim Hicken. If you have any questions, please contact him at (614) 644-3199.

Sincerely,

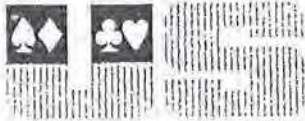
A handwritten signature in cursive script that reads "Gregory Jay White".

Gregory Jay White  
Fire Inspector II  
Bureau of Underground  
Storage Tank Regulations

GJW/lf

enclosure

cc: file



## The United States Playing Card Company

Beech Street at Park Avenue • Cincinnati, Ohio 45212 • (513) 396-5700

November 16, 1989

BUSTR

7510 East Main Street

P.O. Box 525

Reynoldsburg, Ohio 43068-3395

Dear Sir:

10/23/89 Alcohol removed from tank. The remaining product was less than three gallons. The total product was pure with no contaminants. Isopropanol alcohol was sold back to our supplier, Ashland Chemical Company; Approximately 1160 gallons.

10/31/89 Employee Steven Hicks, John Bushelman Construction Company, started at approximately 7:30 A.M. to exhume the tank. (Their equipment arrived on 10/30/89.) The blacktop area above the tank was in excellent condition and the area below the pump and piping was the same. There was no sign of leakage. The blacktop was cut and removed. The soil directly below the blacktop was excellent with no sign of being contaminated. As the earth and special fill was removed there was no sign of contamination. The N.F.D. fireman, Mr. Dan Gaffney, gave permission to remove the tank.

Mr. Gaffney ordered soil samples taken for testing at corners and the center of the tank. (Three samples.)

The loose earth was scraped off areas by Steven Hicks, where samples were taken and dug down (10) ten inches or so to get solid earth. The samples were immediately put into plastic containers. The plastic containers were then wrapped in plastic food wrap, then wrapped in aluminum foil then placed into a clean (2½ gallon) bucket half filled with ice and the lid was closed tight. The bucket containing the samples was placed in the walk-in food locker; approximately 35° refrigeration.

11/1/89 The next morning the container with the three samples was delivered to Cardinal Laboratory, 618 Buttermilk Pike, Covington, Kentucky, 41017; Telephone number (606) 341-9989. The delivery was made by Tim Wagner of City Dash Trucking Company

Sample Date: 10/31/89

Delivered to Laboratory: 11/1/89

Results Received: 11/14/89

Chain of custody of samples: Steven Hicks put into containers; the containers were given to Steve Otten, Assistant Purchasing Agent. Steve Otten gave them to Bill Martin who immediately performed the above procedure. The truck driver, Tim Wagner, delivered to Cardinal Laboratory.

Mr. Steven Hicks - John Bushelman Construction Company

Mr. Dan Gaffney - Norwood Fire Department, 4725 Montgomery Road, Norwood, Ohio  
45212, Telephone (513) 396-8113.

If further information is required or if I can be of additional help, please  
contact me at your convenience.

A handwritten signature in cursive script, reading "Wm J Martin".

William J. Martin  
The United States Playing Card Company  
Beech and Park Avenue  
Cincinnati, Ohio 45212



# CARDINAL LABORATORIES

ANALYTICAL SERVICES & CONSULTANTS

WATER • COAL • PETROLEUM • SOIL • WASTEWATER

NOVEMBER 10, 1989

MR. BILL MARTIN  
UNITED STATES PLAYING CARD  
BEECH AND PARK  
CINCINNATI, OH 45212

CARDINAL PROJECT I.D.: 89638/3  
DATE RECEIVED: 11-1-89  
COLLECTION METHOD: GRAB  
MATRIX: SOIL

PROJECT NAME: TANK REMOVAL  
PROJECT NUMBER: -  
PURCHASE ORDER NUMBER: 11234  
SAMPLE I.D.: #1  
DATE SAMPLED: 10-31-89 TIME: 2:45 PM  
COLLECTED BY: SO,SH,DG

<u>PARAMETERS</u>	<u>STANDARD METHOD</u>	<u>RESULTS</u>	<u>ANALYST</u>
ISOPROPYL ALCOHOL	GC-FID	<10mg/kg	WC 11/10

ANTOINETTE C. MARSHALL  
ANALYTICAL LABORATORIES' DIVISION

cc: DOMINIC E. RUSCHMAN  
MICHELE L. MILLER



# CARDINAL LABORATORIES

ANALYTICAL SERVICES & CONSULTANTS

WATER • COAL • PETROLEUM • SOIL • WASTEWATER

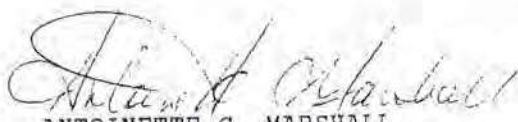
NOVEMBER 10, 1989

MR. BILL MARTIN  
UNITED STATES PLAYING CARD  
BEECH AND PARK  
CINCINNATI, OH 45212

CARDINAL PROJECT I.D.: 89638/3  
DATE RECEIVED: 11-1-89  
COLLECTION METHOD: GRAB  
MATRIX: SOIL

PROJECT NAME: TANK REMOVAL  
PROJECT NUMBER: -  
PURCHASE ORDER NUMBER: 11234  
SAMPLE I.D.: #2  
DATE SAMPLED: 10-31-89 TIME: 2:45 PM  
COLLECTED BY: SO,SH,DG

<u>PARAMETERS</u>	<u>STANDARD METHOD</u>	<u>RESULTS</u>	<u>ANALYST</u>
ISOPROPYL ALCOHOL	GC-FID	<10mg/kg	WC 11/10

  
ANTOINETTE C. MARSHALL  
ANALYTICAL LABORATORIES' DIVISION

cc: DOMINIC E. RUSCHMAN  
MICHELE L. MILLER

**APPENDIX E**  
**1994 PHASE I REPORT**

## Due Diligence Audit

*The United States Playing Card Company  
Beech and Park  
Cincinnati, OH 45212*

*July 8, 1994*

ERM, Inc.  
450 West Wilson Bridge Road  
Columbus, Ohio 43085



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## EXECUTIVE SUMMARY

Environmental Resources Management, Inc. (ERM) was contracted by The United States Playing Card Company (USPCC) to conduct an environmental compliance audit of their Cincinnati, Ohio facility in support of USPCC's potential sale of the facility.

The objective of the audit was to assess and verify the facility's performance and status regarding environmental regulations, assess historical information and assess the likelihood of the presence of site contamination. The scope of work included a site inspection and review of on-site environmental records, development of site history via available records, purchase and review of regulatory database information and submittal of a report of findings.

Based on currently available information and our professional experience and expertise in environmental affairs, particularly in the area of potential liabilities associated with property transfers, it is our opinion, as qualified herein, that the following issues are associated with USPCC:

- Historical Use - Potential use of PCBs and mercury by former fluorescent light manufacturing tenant; unknown chemical use and disposal practices by other prior tenants.
- Air - Exceedance of air permit limitations regarding the use of clean-up solvents; potential unpermitted sources; no documentation of solvent use calculations.
- Wastewater - Exceedances of permitted limits for copper, mercury, zinc and oil and grease and lack of source information.
- Hazardous Waste - Lack of waste drum labeling and dating; incomplete manifest records; obsolete/unused materials on site.
- Solid Waste - Waste destinations are not recorded in files; determinations that wastes are non-hazardous not in files.
- Storage Tanks - Potential contamination by three prior solvent tanks removed without collection of soil samples; lack of closure acknowledgment by the Ohio Environmental Protection Agency (Ohio EPA) for alcohol tank.
- PCBs - Potential PCB soil contamination at power house; lack of consistent PCB inventory records; potential PCBs in elevator hydraulic fluids; potential PCB use by prior fluorescent light manufacturing tenant.
- Asbestos - Clearance air monitoring data for 1993 abatement project not present in files.

- Groundwater - No identified issues.
- Emergency Planning and Community Right-to-Know - Recordkeeping of non-applicability determinations lacking; documentation of report submittals not present.
- Spill Prevention and Emergency Response - No issues.
- Occupational Safety and Health - Broken railing around wastewater settling basin; no employee observation/monitoring for dust in coating mix area.
- Other Potential Sources of Contamination - Solvent spray shed in front of building #10; former drum storage area behind building #10; porous wood block floors.

## 1.0

### INTRODUCTION

Environmental Resources Management, Inc. (ERM) was contracted by The United States Playing Card Company (USPCC) to conduct an environmental compliance audit of their Cincinnati, Ohio facility in support of USPCC's potential sale of the facility.

The scope of work for this audit is described in ERM's proposal number 94-0822 which was submitted to Mr. Arthur L. Thomas, Plant Engineer for USPCC, on May 24, 1994. In brief, the scope includes a site inspection and review of on-site environmental records, development of site history to the extent information is readily available within the schedule and budget of the project, purchase and review of regulatory database information, and submittal of a concise report of ERM's findings.

The site was audited on June 3, 1994 by Ms. Cindy D. McCandlish, Senior Environmental Scientist, and Ms. Jeanne M. Reilly, Environmental Scientist, both of ERM's Columbus, Ohio office. Mr. Thomas conducted the site tour and was interviewed during the site visit. In addition, Mr. Michael G. Massay, Safety Engineer, participated in the site tour and was interviewed.

ERM previously conducted an Environmental, Health and Safety Risk Assessment and Facility Compliance Audit in January 1989. Information from that report is incorporated as appropriate into this report.

## 1.1

### FACILITY DESCRIPTION

USPCC is located in the City of Norwood, Hamilton County, Ohio. Norwood is a suburb of Cincinnati. The facility is located just west of Interstate 71 at the intersection of Beech and Park Roads. The site location is illustrated on Figure 1 in Appendix A. The property is zoned and developed as General Industrial.

USPCC occupies a site of 20.4 acres. The facility totals approximately 830,000 square feet of manufacturing, office and storage areas housed in sixteen buildings. The locations of the buildings and their numbering system are shown on Figure 2 in Appendix A. In general, the buildings and grounds are in good condition given their age and long period of use for manufacturing. Every floor of each building was not inspected. The inspection focused on areas of the site currently in use. Photographs taken during the site inspection are provided in Appendix B.

There are no surface water bodies or known environmentally sensitive areas, such as floodplains, wetlands, or wildlife refuges, on the site.

Approximately 530 people are employed at USPCC. Approximately 480 employees currently work two to three production shifts daily, depending on production demands. Approximately 50 employees function in managerial and office roles.

## 1.2

### *FACILITY OPERATIONS*

USPCC is the major U.S. producer of playing cards. They are the primary provider of playing cards to the nation's casinos and set the industry standards by their stringent protocols for paper stock, printing and finishing.

USPCC manufactures multi-grade playing cards using a three-step process: paper conversion, printing and finishing.

#### Paper Conversion

Paper conversion consists of laminating, undercoating and crushing. During lamination, two rolls of white paper are glued together into a double thickness sheet. The glue used in this process contains black pigment to eliminate opacity. The glue is mixed in-house and consists of starch, corn syrup, alum and pigment.

The laminated paper is coated with a kaolin-clay and latex based coating to whiten and stiffen card stock and prevent ink from blurring when it is applied.

The third step, crushing, is a process where the laminated, coated paper stock is passed through a series of rollers which smooth the paper to a uniform thickness.

#### Printing

The second major production process is printing. Printing consists of applying inks using printing plates affixed to rolls and, afterwards, applying a protective coating to the paper stock.

The printing process is accomplished using high-speed web-type printers. As a roll of paper passes through the printer rolls, both sides of the paper are printed simultaneously. A transparent coating is then applied, and the paper is oven-dried and cut into sheets. Each sheet produces one deck of

cards. The protective coating is an isopropyl alcohol-based liquid which is purchased by the facility.

### Finishing

The third process is product finishing. Product finishing consists of cutting the card sheets into strips, punching out individual cards, inserting the cards into boxes, sealing the boxes in cellophane and placing the boxes in shipping boxes.

The production process is supported by a variety of other operations which include:

- Shipping and Receiving
- Coating mixing
- Solid and Hazardous Waste Management
- Maintenance
- Research (small scale)
- Management
- Sales
- Quality Assurance

Power was previously generated at a boiler house on the property. In 1986, USPCC began purchasing steam from the city and the power house was put on stand-by, to be used only in an emergency. Water is provided by two on-site wells; water storage is in a reservoir and a water tower. Finished goods and equipment storage occurs in several buildings that are no longer required for production or support operations.

## 1.3

### *ADJACENT PROPERTIES*

USPCC is located in an area that includes manufacturing, commercial and residential properties. Adjacent properties include the following:

- North - city park, the City of Norwood vehicle impoundment, the former City of Norwood incinerator, and various small commercial sites; the Baltimore and Ohio Railroad borders the USPCC property to the northeast.
- East (across I-71) - Kenner Industries, a manufacturer of metal and plastic toys, and Cincinnati Milacron.

- West - Park Avenue borders the site; a police academy, the City of Norwood public drinking water well, and Siemens Energy and Automation (manufacturer of electric motors) occupy the area on the opposite side of Park Avenue.
- South - Dinagraphics, manufacturer of paper labels produced using printed heat transfer; south of Dinagraphics is Robertson Road.

#### 1.4

#### *SITE HISTORY*

According to site personnel and as recorded in ERM's 1989 report, the site was farmland prior to the construction of the eighteen USPCC buildings which began in 1900. Ownership records at the Hamilton County Auditor's Office indicate that the site has been owned by U.S.P.C. Operating Company, Inc. since April 21, 1982. The property was owned by Diamond International from October 6, 1969 until 1982. The prior owner was USPCC, which acquired the site prior to 1937.

Aerial photographs were reviewed at the Hamilton Soil and Water Conservation District/Soil Conservation Service. Photos from 1990, 1987, 1977, 1975, 1956, 1951 and 1938 were reviewed. Scale of the photos averaged 1 inch = 2000 feet, so that details could not be distinguished. However, in general, no significant issues such as large-scale waste disposal areas were noted on the photos. Coal storage piles were evident in the 1951 through 1987 photos in the areas north of building #10 and/or north of building #1. Areas appearing disturbed or different in appearance due to materials storage, disposal or other activities included the area on the north side of building #1 in 1990, an area north of building #10 in 1990, 1977 and 1956, and an area on the east side of building #17 in 1987, 1977, and 1975. The area north of building #1 is now level and covered with asphalt. The area north of building #10 is level and covered with grass and/or coal pile remnants. The area east of building #17 was not specifically inspected for evidence of disturbance.

Storage/disposal/disturbance was also noted on the adjacent property to the south (now Dinagraphics) just south of USPCC building #18 in the open area on the 1951 photo. The aerial photographs were not readily reproducible in legible form, therefore, no copies are provided in this report.

Historical Sanborn Fire Insurance maps were obtained for the years 1981, 1950 and 1917 from Environmental Risk Information and Imaging Systems (ERIS) in Alexandria, Virginia. The fire insurance maps illustrate the buildings and facilities as they were recorded in those years by field inspectors. Copies of the Sanborn maps are provided in Appendix C.

The 1917 map shows that a kitchen and dining room building was located at the site of the current building #1. The dining building appears to have been the building moved to the east (as suggested by Art Thomas), which is now building #10, maintenance department. This information is consistent with 1924 photos and earlier architectural drawings reviewed at the Cincinnati Historical Society (CHS) library. The site of the current building #10, maintenance department, was occupied by a smaller building used for storage and a vehicle garage. This building was apparently demolished to allow replacement with the former dining building. In 1917 a greenhouse was located to the south of the reservoir, near the current 100,000-gallon elevated water tank.

The 1950 map shows the buildings that are present currently, with the exception of #16, which was recently torn down due to a damaged roof. Building #10, which is currently the maintenance department, was occupied by the machine shop. The 1950 map shows that two other companies occupied building #7. Gruen Watch Company occupied the 1st and 2nd floors of the building. The tenant occupying the 3rd and 4th floors was Sperti, Inc., a manufacturer of fluorescent lamps. The Sanborn map does not specify information regarding operations and/or chemical use/disposal practices of these tenants. However, based on knowledge of the contents of fluorescent light fixtures, there is a possibility that Sperti utilized oils containing polychlorinated biphenyls (PCBs) and/or mercury vapor in their manufacturing process.

In 1981, the facility appeared much the same as currently, except for building #16 mentioned above. The current water tower had been installed between 1950 and 1981. Building #7 was occupied by Precision Products Company, a division of K.D.I. Corporation. No information is noted as to the nature of their operations or products.

Fire fighting plans, dated 1989, for each floor of the buildings were provided by USPCC. The plans show the equipment, materials, and operations in each area, as well as flammable materials, fire extinguishers, and evacuation routes to exits. In 1989, the basement of building #7 was leased to Wine Racks Limited, whom Mr. Thomas indicated was a manufacturer of wooden wine racks. The first floor of building #7 was occupied by Congress Video Group, who copied video tapes.

The site has always been used to manufacture playing cards. No significant process changes have occurred with the exception of periodic replacement of presses with newer models and the installation of automated equipment to perform job functions previously performed manually. In addition, ERM recognizes the likelihood that raw materials

have changed over time. Specifically, it is possible that printing inks used historically contained heavy metals such as lead and chromium. Further, the potential exists for a large volume of solvents to have been used historically for ink clean-up. It is not known how these solvents were managed.

In addition, a Cincinnati Historical Society (CHS) publication, *Cincinnati: The Queen City* by Daniel Hurley, indicates that as part of war support efforts in the 1940s the United States Playing Card Company produced parachutes.

Also, the photograph collection of the CHS includes photos of clock tower chimes and other facilities (studios, operating room and reception room) associated with radio station WSAI/8XAW that was housed in USPCC in the 1920s. The 1924 photographs also include photos of medical and dental facilities, a 2,000-seat restaurant and two recreation rooms at USPCC. It was not specified as to whether these were facilities provided solely for employees. There are no known environmental issues associated with the radio station, medical/dental or dining facilities.

## 1.5

### REGULATORY DATABASE INFORMATION

A computerized search of environmental regulatory agency database information was purchased from Environmental Risk Information and Imaging Services (ERIIS) in Alexandria, Virginia. Findings of the search are discussed below; the complete ERIIS report is provided in Appendix D.

#### *CERCLIS Sites (within one-half mile of site) and NPL Sites (within one mile of site)*

The U.S. EPA compiles a summary of its activities under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) on the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS). The CERCLIS provides data on neighboring facilities which may have an impact on the property. The list is also checked to determine if any action related to CERCLA has been taken at the property itself. Facilities on the CERCLIS may pose a potential or known threat to human health and the environment or are being investigated as suspected hazardous waste sites. Sites on the CERCLIS which are determined to constitute an immediate threat to human health and the environment are then placed on the National Priorities List (NPL).

USPCC is listed on the CERCLIS. The database indicates that discovery was on 8/1/80. A preliminary assessment conducted on 9/25/85 determined that no further action was required. The site was not placed on the NPL. Dee Sign Company at 2501 Norwood Avenue, approximately 0.5 miles northwest, is also on CERCLIS. Discovery was on 6/1/81; the preliminary assessment on 9/1/84 determined that no further action was required. There are no other CERCLIS or NPL sites reported within a one-half mile radius of USPCC.

The Ohio EPA records (Appendix E) on the CERCLIS investigation of USPCC indicate that no hazards were identified. The investigation was conducted because of a suspicion of illicit wastewater discharge to Duck Creek. The Field Investigation Team (FIT) concluded that, while surface water contamination of Duck Creek was a possibility, the potential for hazardous waste disposal and groundwater contamination was minimal at the site. The site was designated a low priority for further action. No action has been taken since the 1985 FIT report. There do not appear to be any current or unresolved CERCLIS issues relative to USPCC.

*Toxic Release Inventory (within one-half mile of site)*

The TRI report contains information on the release and/or transfer of toxic chemicals as required to be reported by industries subject to the Emergency Planning and Community Right-to-Know Act of 1986 (SARA Title III).

USPCC is not listed in the TRI database. Three TRI sites were identified within 0.5 miles of USPCC:

- Dinagraphics  
Beech & Robertson Street  
0.1 miles south  
Reported Chemicals: toluene, methyl ethyl ketone
- Siemens Energy & Automation  
4620 Forest Avenue  
0.3 miles northwest  
Reported Chemicals: xylene (mixed isomers)
- Shepherd Chemical Co.  
4900 Beech Street  
0.4 miles northwest  
Reported Chemicals: methanol, ammonium nitrate (solution), sulfuric acid, cadmium compounds, chromium compounds, cobalt compounds, copper compounds, hydrochloric acid, lead compounds, manganese compounds, nickel compounds, zinc compounds, nitric acid.

*RCRA Treatment, Storage, or Disposal (TSD) Facilities (within one mile of site)*

The RCRIS database contains information on facilities that treat, store or dispose of hazardous wastes that are regulated under RCRA. USPCC is not on the TSD list; there are no reported RCRA TSD facilities within one mile of the facility.

*RCRA Generators/Violators (within one mile of site)*

RCRIS also lists facilities that are considered hazardous waste generators as defined by the Resource Conservation and Recovery Act (RCRA). USPCC is listed as a small quantity generator (SQG) of hazardous waste. Reported waste codes include F001 (spent halogenated degreasing solvent), U226 (methyl chloroform), and D000 (non-regulated or non-hazardous). USPCC representatives indicated that they are a Conditionally Exempt SQG (CESQG) which is subject to even fewer regulations. USPCC should ensure that all paperwork submitted to Ohio EPA clearly indicates the CESQG status.

Dinagraphics Inc., Beech and Robertson Streets, is listed as a large quantity generator. Reported waste codes include D001 (ignitable), F005 (spent non-halogenated solvents), U002 (acetone), U031 (n-butyl alcohol), U112 (ethyl acetate), U155 (methapyrilene), U159 (methyl ethyl ketone), U161 (methyl isobutyl ketone), U171 (2-nitropropane), U220 (toluene), and U239 (m-xylene).

The database notes any facilities which have received Class I violations under the RCRA. Like the CERCLIS list, data are provided on neighboring facilities which are permitted under RCRA and have received a notice of violation which may have an impact on the property. Violations under RCRA are issued for a number of reasons that range from paperwork deficiencies to the improper handling and disposal of hazardous waste. The list of violations may indicate patterns of disposal problems at nearby facilities. USPCC and Dinagraphics are reportedly RCRA compliant.

*Emergency Release Notification System (ERNS) (subject property only)*

The ERNS database records information on the sudden and/or accidental release of hazardous substances and petroleum into the environment. USPCC was not identified on ERNS.

## *Ohio Environmental Protection Agency Lists*

### *Registered Underground Storage Tank (UST) Facilities (within one-fourth mile of site)*

There is one site with registered underground storage tanks within a one-fourth mile radius of USPCC. The site is Dinagraphics, adjacent to USPCC to the south:

- Dinagraphics  
Beech and Robertson Streets  
0.1 miles south  
Four tanks: each 4 years old, capacity 5,000 gallons, of bare steel.  
Contents are methyl ethyl ketone, haz-64-17-5, haz-109-60-4, haz-6474-89-8.

### *Leaking Underground Storage Tank Facilities (within one-half mile of site)*

The LUST database reports that there are ten sites within a one-half mile radius which have reported suspected or confirmed releases of petroleum from a regulated UST. USPCC is not reported as a LUST site. Of the ten listed sites, the three nearest USPCC are:

- Former Ed and Frank Motors  
2795 Robertson Ave.  
0.3 miles southeast  
Reported LUST; suspected or confirmed release of petroleum from a regulated UST; eligible for trust fund oversight and/or spending.
- Siemens Energy and Automation  
4620 Forest Avenue  
0.3 miles northwest  
Confirmed LUST; release of petroleum from an UST not regulated by RCRA Subtitle I.
- LUKA  
3004 Harris Avenue  
0.3 miles northeast  
Reported closure of an UST.

Specific information regarding the extent of contamination at these sites, if any, is not provided in the database, however, cleanup of such tank releases is the responsibility of the tank owner. Therefore, these sites are not expected to impact the subject property.

*Solid Waste Facilities (within one-half mile of site)*

There are no permitted solid waste landfills listed within a one-half mile radius of USPCC.

*Ohio Master Sites List (within one mile of site)*

The MSL is the state version of the CERCLIS. USPCC is on the MSL (see CERCLIS discussion above). There do not appear to be any current or unresolved issues relative to the MSL. There are three other sites within one-mile that are on the MSL:

- United States Playing Card Co.  
Park Ave. & Beech Street  
Preliminary Assessment 9/18/85  
Low priority, not delisted
- Shepherd Chemical Co.  
4900 Beech Street  
0.4 miles northwest  
No priority assigned, not delisted
- Dee Sign Company  
2501 Norwood Avenue  
0.4 miles northwest  
Preliminary Assessment 8/10/84  
Low priority, not delisted
- EM Ind Inc, EM Science Div.  
2909 Highland Avenue  
0.7 miles northeast  
Preliminary Assessment 5/7/86  
No priority assigned, not delisted

The entire environmental database report, including a radius map with facility locations, is included as Appendix D.

## 2.0 FINDINGS

### 2.1 AIR EMISSIONS

#### 2.1.1 General

USPCC is regulated for air emissions and sources by the Ohio EPA Southwest District Office (SWDO) and the Hamilton County Department of Environmental Services (HCDES).

USPCC owns the following air emissions sources which have been reported to HCDES. With the exception of the boilers, which would emit coal decomposition products, each of USPCC's sources emits volatile organic compounds (VOCs) from either solvent-based inks or solvents.

- B001, coal boiler - not operated since 1986
- B002, coal boiler - not operated since 1986
- R004, Sheet Fed Press #1 - did not operate in 1993, no plans to operate again
- R020, Web press #11 - did not operate in 1993, no plans to operate again
- R021, Web press #12
- R022, Web press #24 equipped with catalytic incinerator
- X001, all other presses - none operated in 1993, no plans to operate again
- X002, clean-up solvents

According to Mr. Thomas, sources B001 and B002 are located in the powerhouse, which is no longer used. These boilers were used to produce steam to power manufacturing operations prior to USPCC purchasing steam from the City, which began in 1986. USPCC keeps current with permitting requirements regarding these boilers in case the need ever arises for them to recommence producing steam on-site.

Source R004 is a sheet-fed press which USPCC does not expect to utilize in the future. The plant is more profitable when it accepts jobs which are on a larger scale than sheet-fed jobs. USPCC has not decided what they plan to do with the press itself. Most likely it will remain on-site.

Sources R020 and R021 are web presses. Mr. Thomas indicated that both of these presses were installed prior to the current emissions control requirements which would call for an incinerator to be installed to reduce emissions from these sources.

Source R022 is also a web press. It was installed in 1990. This press is attached to a catalytic incinerator to control VOC emissions.

Source X001 applies to all other presses which exist at the facility but which are not used. Again, USPCC keeps current with permitting requirements in case they opt to use these presses again.

Source X002 is generally referred to as clean-up solvents. USPCC employees apply solvents with rags to clean ink from printing surfaces. This cleaning is conducted periodically throughout printing to ensure quality ink transfer. The materials in this category include roller cleaner, isopropanol, blanket wash and mineral spirits.

Aside from the exceptions noted in Section 2.1.2, USPCC appeared to be in compliance with applicable air regulations and permits.

## 2.1.2

### *Compliance Issues*

1. At the time of the site visit, USPCC was attempting to resolve an issue with the HCDES regarding usage of clean-up solvent. Ohio EPA has established a permitted limit for the amount of solvent USPCC is allowed to use for clean-up on an annual basis. USPCC exceeded this amount in 1993. This exceedance was reported to HCDES in the Emission Inventory Questionnaire submitted to HCDES in March 1994 to reflect source emissions during the calendar year 1993. ERM reviewed correspondence indicating USPCC and HCDES are considering options which include changing the permit limit or switching to a lower VOC solvent. There was no indication, either from document review or discussion with Mr. Thomas, that HCDES will pursue enforcement regarding the clean-up solvent issue. Rather, it is considered likely an agreement will be made which is suitable to all parties concerned and this agreement will be reflected in the renewed permit scheduled to be issued in September 1994.
2. The permit for source R022 limits the amount of VOCs that can be emitted on an hourly and annual basis. To track this, USPCC records the amount of VOCs present in the inks used and the usage. From this information, they can calculate the total emissions generated. Calculations documenting compliance with the emissions limits should be maintained in the on-site files.

3. ERM noted the existence of a baghouse to control particulate emission from the paper trim baler. Emissions sources and control devices of this nature typically require registration with Ohio EPA. USPCC should investigate the need for a permit for this source and, if necessary, pursue filing the necessary application with the Ohio EPA.
4. USPCC should consider whether Title V of the Clean Air Act Amendments applies to them. The Title V applicability determination can be accomplished with existing air permits as long as federally enforceable limits are incorporated into the permits. Because the facility maintains several permitted printing presses, potential facility emissions will be calculated based on the assumption that all presses constantly run at maximum capacity. This assumption could categorize USPCC as a major source which emits greater than 100 tons per year of VOCs. USPCC would then be subject to Title V permitting. Regardless of whether the Title V requirements apply, USPCC should document its applicability determination in the site files.

## 2.2 WASTEWATER

### 2.2.1 General

Wastewater is generated from sanitary uses, non-contact cooling water uses, clean-up of adhesive and coating mixing tanks, drum rinsing and various other site activities. No wastewater is discharged to a stream, creek or other water body, therefore no NPDES permitting is needed.

Because all site wastewater discharges are to the municipal combined storm and sanitary sewer, no NPDES stormwater discharge permit is required.

USPCC discharges industrial wastewater to the Metropolitan Sewer District's (MSD) combined storm and sanitary sewer under a permit number MAI-008, issued January 1992. The permit is scheduled to be renewed on November 1, 1994. Permitted industrial discharges originate from Building #1, the main manufacturing building and include enamel coating from the Microjet coating machine, tin wash area and mixing/transfer tanks; non-contact cooling water from the laminator and paste mix area; and cooling water, latex coating and press wash-up from the press. Building #1 discharges are either routed directly to the sewer or to a settling tank (Photograph #1) which discharges to the sewer. Roughly, the east half of building #1 discharges to the settling tank and the west half discharges directly to the sewer.

USPCC monitors their wastewater discharge quarterly and submits copies of the analytical results to MSD. USPCC is required to monitor: pH, vapor space organics, cadmium, chromium (total and hexavalent), copper, lead, mercury, nickel, silver, zinc, cyanide (total, free and amenable), phenols, oil and grease, and flashpoint.

Quarterly monitoring data from March 1993 indicated exceedances of permitted limits for copper, mercury and zinc. November 1993 quarterly samples exceeded limits for mercury and oil and grease. MSD issued an administrative order (AO) to USPCC on February 10, 1994 regarding exceedances of oil and grease and mercury. The AO required:

- submittal of Remedial Action Plan (RAP)
- sewer survey
- plan to install sampling and gauging manhole
- installation of sampling and gauging manhole
- approval of installed manhole
- monthly progress reports

#### 2.2.2

#### *Compliance Issues*

1. As of the date of this report, the source of the exceedances had not been determined. USPCC's RAP did not commit to identifying and eliminating the source(s) of the exceedances, however, USPCC is responsible for continuing compliance with the discharge limits. USPCC appears to be in compliance with the requirements of the AO and their RAP.

### 2.3

#### *HAZARDOUS WASTE MANAGEMENT*

#### 2.3.1

#### *General*

USPCC is a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste with Facility ID OHD004234217. The facility's only hazardous waste stream consists of spent solvents (mineral spirits) generated in the finishing and maintenance departments.

Spent solvents are accumulated in 55-gallon drums located in the finishing and maintenance departments. These satellite accumulation drums were not pointed out during the tour, however, they require

labeling indicating their contents and accumulation start date. When these drums are full, they are transferred to the hazardous waste storage facility located at the east end of the maintenance building. The facility is roofed and enclosed on three sides (Photograph #2). The concrete floor is bermed and sloped to direct any releases to the collection sump provided. Ashland Chemical is contracted to transport and dispose of the waste. The hazardous waste storage area is adjacent to a building used to store flammable materials (building #12).

At the time of the inspection, the outdoor portion of the storage facility contained the following:

- used mineral spirits (1 drum)
- waste oil (6 drums)
- acrylic resin solution from Sun Chemical (8 drums)
- Foamkill 649 (1 drum)
- Old glue (1 drum)
- Ammonium hydroxide (2 totes and 1 drum)
- Waste coating - (1 drum)

The flammable solvent storage building contained:

- Oil and grease, various (11 drums and some 5-gallon buckets)
- Mineral spirits (2 drums)
- methaol (1 drum)
- 1,1,1-trichloroethane (2 drums)
- Hydraulic oil (1 drum)
- Isopropanol 99% (3 drums)

The flammable storage building is sprinklered for fire suppression. Mr. Massay visually observes the condition of the hazardous waste facility when he opens the area twice weekly for additions to and removals from the facility.

Manifests and land disposal restriction (LDR) forms are maintained in Mike Massay's files.

### 2.3.2

#### *Compliance*

1. USPCC representatives consider the site to be a CESQG, based on generation of only one drum of spent solvent every six months. It is

important to note that the database search identified USPCC as a small quantity generator, which requires additional documentation such as manifests and emergency plans, as well as adherence to storage condition requirements. USPCC should ensure that generation of waste is kept below the regulatory threshold of 100 kg (approximately 25 gallons) per month, with accumulation of no more than 100 kg (about 5 drums), and that paperwork submitted to the agency in the future clearly indicates the CESQG status.

2. During the site inspection, one drum of spent solvent was present in the hazardous waste storage area. The drum was not correctly labeled with its contents or the date accumulation began.
3. Two of the seven manifests reviewed from the period 8/20/92 to 5/13/94 did not appear to have been returned to the generator as required. The original manifest and land ban forms were not in the file for the 9/1/93 shipment of waste solvent and non-hazardous waste ink (#MI3205909) and the 9/1/93 shipment of non-hazardous waste ink, calcium sulfo-aluminate, and mineral seal oil. Although CESQGs are exempt from manifest requirements, RCRA requires SQGs to maintain these documents in their files. If the documents are not returned by the disposal facility it is up to the generator to contact the disposer regarding the disposition of the waste and the paperwork.
4. Unused and/or obsolete materials should be moved off-site for disposal or other appropriate management. These materials include Foam-kill 649, old glue, and 1,1,1-trichloroethane.

## 2.4 SOLID WASTE MANAGEMENT

### 2.4.1 General

Solid wastes generated by USPCC include:

- ink - from presses; returned to Sun Chemical (supplier) for reuse to make black ink; non-returnable goes to Ashland for fuel blending
- coating - cleanup waste from Microjet; to Ashland Chemical for solidification and landfilling
- oil - from press leaks, spills, etc.; to Keenan Oil Company, Cincinnati, for reprocessing as #4 fuel oil
- rags - from clean-up in print department with liquid plate cleaner; put in closed flammables containers and laundered by Community Towel in Columbus, Ohio

- pigs with lubricating oil - used to absorb leaks at presses and for spills, squeegeed out; to Ashland for landfilling
- scrap metal - from maintenance and obsolete equipment; 2 dumpsters to Cohen in Cincinnati for processing
- white paper from converting, skeletons from printed sheets; baled and sold
- pallets - sold to a rebuilder
- drums - reusable plastic and metal drums are stored on and near the building #1 loading dock (Photographs #3 and #6), then returned to the suppliers for credit (Photographs #3 and #6); others go to Cincinnati Drum Service for shredding (plastic) or reconditioning (metal)
- other trash - from cafeteria, offices, production areas; to compactor then landfilled by Rumpke, Cincinnati

There was a one-time disposal of ethylene glycol/water from the press #24 cooling system. Five drums were shipped off-site in 9/93 as non-hazardous waste. Ethylene glycol waste is not a routinely generated waste stream.

Waste oil, ink, coating and ethylene glycol/water have been profiled to determine their characteristics and method of disposal. As part of this process their non-hazardous nature would have been confirmed.

#### 2.4.2

#### *Compliance Issues*

1. Destinations for each type of waste should be known by USPPC representatives and recorded in the files for future reference.
2. Records of determinations that waste streams are not hazardous under RCRA should be maintained in the files.

### 2.5

#### *STORAGE TANKS*

#### 2.5.1

#### *General*

Above ground storage tanks include two large clay slurry tanks located outdoors on the south side of building #1. The tanks are located within a concrete dike. Upon reacting to a hatch failure and spill from one of the tanks in February 1994, it was discovered that a drain in the dike had been left open, which allowed approximately 4,000 gallons of slurry to flow to

the sewer. The drain is now closed to ensure containment of any leaks, spills or overfills prior to controlled release. The slurry is not a material requiring release reporting; there are no environmental issues associated with the spill. Other above ground tanks are in use for storage and mixing of coating raw materials. A 100-gallon above ground tank is used for storage of diesel fuel. The above ground tanks observed appeared to be in good condition. No issues were noted regarding these tanks.

Four underground storage tanks were previously used at USPCC. Three of the tanks were removed in April 1988, prior to regulations that now require collection of soil samples to confirm the absence of contamination from USTs. The three tanks removed in 1988 stored kerosene, mineral spirits, and turpentine. They were located between buildings #1 and #3, across the walkway from the diked slurry tanks, in the corner (Photograph #5). The capacities of the tanks are not known. Mr. Thomas indicated that, at the request of USPCC lenders, the contractor who removed the tanks reported in writing that his visual observations at the time of removal did not detect any evidence of leakage such as staining, free product or damaged tanks.

The fourth tank, used for storing alcohol, was removed in October 1989. It was located on the north side of building #1, approximately in the center next to the building (Photograph #6). Total capacity of the tank is not known, but 1160 gallons of alcohol was removed from the tank prior to removal from the ground. The tank was removed by John Bushelman Construction Company on 10/31/89. Three soil samples were collected from the tank vault and analyzed by Cardinal Laboratory for isopropyl alcohol by gas chromatography (GC-FID). The laboratory reported results below detectable levels at a detection level of 10 mg/kg for all samples. A summary of the tank removal project was submitted to BUSTR on November 16, 1989. Analytical results were not included. BUSTR responded on December 7, 1989 by indicating that the information was forwarded to Ohio EPA because alcohol tanks are not regulated by BUSTR. No further communication regarding the tank removal was identified in the file.

## 2.5.2

### *Compliance Issues*

1. There is a potential for contamination to exist as a result of use of the three underground tanks removed in 1988. Although visual observations detected no evidence of leakage, positive confirmation could be obtained only by collection and laboratory analysis of soil samples from the tank vault, and groundwater samples if encountered.

2. USPCC should contact Ohio EPA to determine the status of the alcohol tank removal with regard to applicable regulations. Submittal of the analytical results to Ohio EPA should confirm that no contamination was associated with this tank.

## 2.6 PCBs

### 2.6.1 General

USPCC representatives believe that all PCB transformers have been removed from the site. They are not aware of any PCB transformers or equipment present on the site at this time.

Test data from analysis of oil from five transformers in May 1980 indicates that one unit contained Askarel which is 60% PCB (transformer #2 located at the powerhouse), and one unit contained 47 ppm PCB (#3 located at the powerhouse) which was considered PCB-contaminated due to the margin of error in the test. Three other powerhouse transformers tested at that time had less than 50 ppm PCB and were considered non-PCB.

Two transformers were removed from the site in 1982 by High Voltage Maintenance (HVM) of Florence, Kentucky. HVM assumed ownership of the transformers and fluids and accepted liability for their disposal. From the records reviewed it is not certain which were the two transformers removed. Further, it is not clear whether PCB transformers or PCB-contaminated transformers remained after the 1982 removal.

Reports from a 1984 inspection of the transformers by High Voltage Maintenance indicate that two of the units were leaking. Transformer #2 at the powerhouse was noted to have a very slight leak at the bottom valve. Very old PCB was noted on the ground. Transformer #2 was considered a PCB transformer and the fluid was tested for only 2 of the 4 performance standards. Transformer #1, a non-PCB unit, was leaking at the top 1 inch valve. The bottom valve was noted to be seeping slightly and the top valve dripping. USPCC had no files confirming cleanup of the PCB stain on the ground by #2.

Other transformers were located on the first floor of building #1, 3rd floor of building #1, and in the basement of building #7. No data indicating that these transformers were tested for PCBs or known PCB or non-PCB were identified in the site files.

## 2.6.2

### *Compliance Issues*

1. There is a potential for PCB contamination to be present at the base of transformer #2 at the powerhouse. The fluid in this transformer was Askarel, which contained 60% PCB. PCB spills are required to be cleaned up and reported as specified in 40 CFR 761. The CERCLA reportable quantity for a PCB spill is one pound.
2. A complete and detailed inventory of the site transformers (present and past) should be prepared and available at the site for review. The inventory should include serial numbers of transformer, manufacturer, size, location, PCB data if known, date of installation and current disposition (in use, not in use, removed and disposed). Without this type of inventory, it is difficult to interpret the file records which are available because they cannot be cross-referenced by serial number. Many of the records were updated, making it difficult to determine which records were prior to the 1982 removal and which were subsequent. The purpose of preparing the inventory is to ensure that all PCB records are consolidated and to demonstrate and document that no PCB transformers remain.
3. There is a potential for PCBs to be present in hydraulic fluids associated with the elevators. Care should be taken to ensure that any leaks of elevator hydraulic fluid are detected promptly and cleanup/disposal of such spills are conducted in accordance with applicable regulations.
4. There is a potential for PCBs to have been used by the fluorescent light manufacturer that occupied the 3rd and 4th floors of building #7 in 1950 as shown on the Sanborn map. Any remaining equipment or materials stored in that area should be removed from the site and handled in an appropriate manner. Any stained soil or suspicious areas associated with building #7 should be managed accordingly.

## 2.7

### *ASBESTOS*

### 2.7.1

#### *General*

USPCC has not conducted a comprehensive, site-wide asbestos assessment to identify all asbestos-containing building materials. Asbestos in the form of pipe insulation and blower housing insulation was removed from the varnish area on the first floor of building #1. The removal was conducted by Rainbow Home Environmental Services, Inc., of Cincinnati, Ohio in 1993. Air monitoring results reported by ACT Environmental, Inc. indicate that concentrations of asbestos fibers ranged

from 0.0141 to 0.4901 fibers/cubic centimeter of air. It is unclear whether these data represent conditions during or after completion of the abatement project. No other monitoring data were found in the asbestos file.

There is known asbestos pipe insulation in the power house, which is currently in use only as a transfer station for steam. The building is not routinely occupied. Expenditure for abatement of asbestos in the powerhouse has been approved for 1994. The abatement project requires shutdown of the steam transmission which in turn requires shutdown of the paper conversion process. The abatement project has been postponed due to production requirements that prohibit shutdown of paper conversion, but is expected to be conducted at the end of summer 1994. USPPC policy is that any damaged or friable asbestos is removed or encapsulated if in occupied areas.

#### 2.7.2 *Compliance Issues*

1. Obtain air monitoring data which represent conditions after completion of the abatement. Review the data to ensure that levels are below the OSHA action level and PEL and file the documentation appropriately.

### 2.8 *GROUNDWATER*

#### 2.8.1 *General*

USPPC utilizes an on-site well for supply of non-contact cooling water for presses. Bottled water is used for drinking. There were initially two wells on the site. Well #1 was put into service in 1902, abandoned in 1984 and formally closed on May 28, 1991. The well was 241 feet deep. Well #2 was installed in 1946 and is still in service. Installation dates and depths for Wells #3 and #4 were not available. These wells were abandoned and formally closed on September 27, 1991. Groundwater was used for drinking water until 1986, when the switch to bottled water was made because of hardness of the groundwater. City water is used for coating make-up and any other process needs. Water quality test data were not available.

#### 2.8.2 *Compliance Issues*

No compliance issues were identified with regard to groundwater. USPPC should be aware that if the groundwater were to be used for

drinking water supply in the future, periodic quality testing will be required because USPCC will be providing a public drinking water supply.

## 2.9 *EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW*

### 2.9.1 *General*

Emergency and Hazardous Chemical Inventory reports have been submitted annually for the facility since 1988 as required by Ohio EPA's equivalent of the federal EPCRA Section 311/312 program. In 1993 the facility reported ammonia, Hydrex P (coating), Hydrocarb 90 (calcium carbonate), Nopco 1097-A (enamel coating component), paper in bulk form, and polyvinyl acetate slurry (coating component).

USPCC representatives have determined that Form R Toxic Chemical Release Inventory reports are not required under the EPCRA Section 313 program. They have determined that the volumes of toxic chemicals manufactured, processed or used do not exceed reporting thresholds. On the basis of our review of MSDSs and quantities of large-volume materials used, it appears that there are no toxic chemicals requiring reporting under Section 313.

### 2.9.2 *Compliance Issues*

1. A facility-wide inventory of chemicals should be prepared. The inventory can include information such as chemical components of each material and their percentages, associated hazards, volumes stored and used at the site, and department(s) using it. The inventory can be updated annually and used to identify chemicals requiring reporting under both of the EPCRA programs.
2. Documentation of the reportable chemicals determination for each EPCRA program should be prepared annually and retained in the file to support the reports submitted or, in the case of Section 313, the absence of reporting.
3. Reports should be submitted to the required regulatory agencies by certified mail with return receipt requested. The return receipt should be maintained in the appropriate file along with copies of the cover letters and reports as proof that reporting was accomplished as required.

## 2.10 *SPILL PREVENTION AND EMERGENCY RESPONSE*

### 2.10.1 *General*

USPCC has a Spill Prevention Countermeasure and Control (SPCC) Plan that was prepared in 1992. The plan appears to be complete, but the need for such a document is not clear. The facility does not have the types and capacities of petroleum storage that would require preparation of an SPCC Plan. The plan was approved internally in February 1993, but has not been certified by a registered Professional Engineer as required by the regulations.

As a conditionally-exempt hazardous waste generator, USPCC is not required to have a RCRA Contingency Plan.

### 2.10.2 *Compliance Issues*

No compliance issues were identified with respect to spill prevention and emergency response.

## 2.11 *OCCUPATIONAL SAFETY AND HEALTH*

### 2.11.1 *General*

Mike Massay is the USPCC Safety Engineer and has primary responsibility for compliance with Occupational Safety and Health Administration (OSHA) requirements. Mr. Massay indicated that Hazard Communication training is conducted for every employee when they start work at USPCC. The training is conducted jointly by Safety and the department in which the person will be working. The department is responsible for training specific to the materials and operations that the individual will be working with and/or exposed to.

Dust collection is provided in the coating mix area on the 1st floor of building #1. Respiratory protection for operators is not currently required in this area. In the past, when ammonia was being tested for use in the mix in place of caustic, respirators were required to be worn.

### 2.11.2

#### *Compliance Issues*

1. The railing around the wastewater settling basin was broken and sections were missing. The railing should be repaired to prevent accidental falls into the basin. If the basin is replaced by a new unit or alternate technology, it should be removed or filled in.
2. Observation and/or monitoring of personnel working in the coating mix area should be conducted to ensure that levels of dust they are exposed to do not exceed regulatory standards.

### 2.12

#### *POTENTIAL SOURCES OF CONTAMINATION*

A solvent spray shed in front of building #10 has been used for spray cleaning of parts with liquid solvents. The shed is a three-sided structure with a roof and roof vent. The base is concrete with grass on two sides. At the time of the inspection, the shed contained 2 red flammable storage cans and two buckets, one of which was full to the top with a dark petroleum-odor liquid. Spray hoses are hooked up to the shed to allow spraying of parts with cleaners. There was evidence that leakage from under the sides of the shed had impacted underlying concrete (staining) and surrounding grass (staining and stressed vegetation). Use of this shed should be discontinued to prevent additional releases of solvents. The shed could be dismantled and affected soil and concrete cleaned up.

The former drum storage area was at the rear of building #10, on the north side of the building (Photograph #7). An April 1992 internal memo in the file noted that cleanup of the waste drum storage area needed to be conducted. Hazardous waste drums dated September 1991 were noted as needing off-site shipment immediately. File information indicates that 29 drums of non-hazardous waste ink and waste oil/absorbent were removed and disposed by OH Materials of Findlay. Twenty-five to thirty drums were returned to suppliers for credit. 160 drums were scrapped. An inspection by Ashland Chemical at about the same time indicated that waste labeling improvements were needed, storage should be moved out of the elements, and some drum types used for waste storage were inappropriate. There is no file information to indicate that, after removal of the drums, the underlying soil was checked for contamination. The absence of contamination from spills or leaks associated with these drums can be confirmed only by collection and laboratory analysis of representative soil samples.

Wood block floors are present in some areas of buildings #2, 3, 4, 9 (carpenter shop) and 10 (machine shop/maintenance). Wood block floors are porous and absorb spilled oils, chemicals and other liquids. There are no requirements to address the presence of these wood block floors, but be aware that disposal of the blocks could require chemical analysis to determine whether hazardous chemicals could leach out.

### 3.0

## CONCLUSIONS AND RECOMMENDATIONS

In general, USPCC responds as required by the various applicable environmental regulations. USPCC participates in permitting and reporting programs such as air, waste water, hazardous waste management, and EPCRA. Additional measures are required in some of these areas to ensure complete compliance, but most of the recommendations relate to documentation and record-keeping. Additionally, several potential sources of contamination were identified. The contamination issues and regulatory compliance areas are summarized below.

### *Potential Environmental Contamination*

Historical operations by tenants such as Gruen Watch and Sperti, Inc. may have had the potential to impact the site, however, there was no information identified during this assessment that would indicate on-site waste disposal or known contamination by the tenants.

There is a potential for contaminants to exist at the solvent washing shed in front of building #10 and at the former drum storage area behind building #10. Also, residential contamination could exist at the location of the three removed solvent tanks and under transformer #2 at the powerhouse.

### *Regulatory Compliance Issues*

- Use of clean-up solvent in volume exceeding air permit limits is being discussed with Ohio EPA. Alternatives include increasing permit limits or switching to a lower VOC solvent. Enforcement action relative to this exceedance is considered unlikely.
- Additional sources of air emissions should be investigated to determine whether they are subject to permitting requirements.
- Consideration of applicability of Title V requirements to USPCC should be made.

- The source of mercury and oil and grease exceedances in wastewater remains undetermined. If quarterly sampling results continue to be compliant with limits, further investigation may not be required. USPCC is committed to periodic monitoring of incoming new materials.
- Obsolete or unused materials that could be hazardous wastes should be removed from the site and disposed of appropriately.
- Proper labeling and manifesting procedures for hazardous wastes need to be followed.
- Solid waste characterization information and off-site disposal destinations should be maintained in the files.
- Status of the alcohol tank removal with Ohio EPA should be determined.
- A transformer inventory should be prepared to document that no PCB units remain.
- Confirmation that levels of airborne asbestos are acceptable in the abated area should be obtained.
- EPCRA documentation should be provided in the files to confirm that reporting determinations have been made and required reports submitted.
- Dust levels in the coating mix area should be evaluated to determine whether respiratory protection is required.



*Appendix A*

*Site Location Map and Facility Layout*

*Appendix B*

*Site Photographs*

*Appendix C*

*Historical Records  
(Sanborn Maps)*

## *Appendix D*

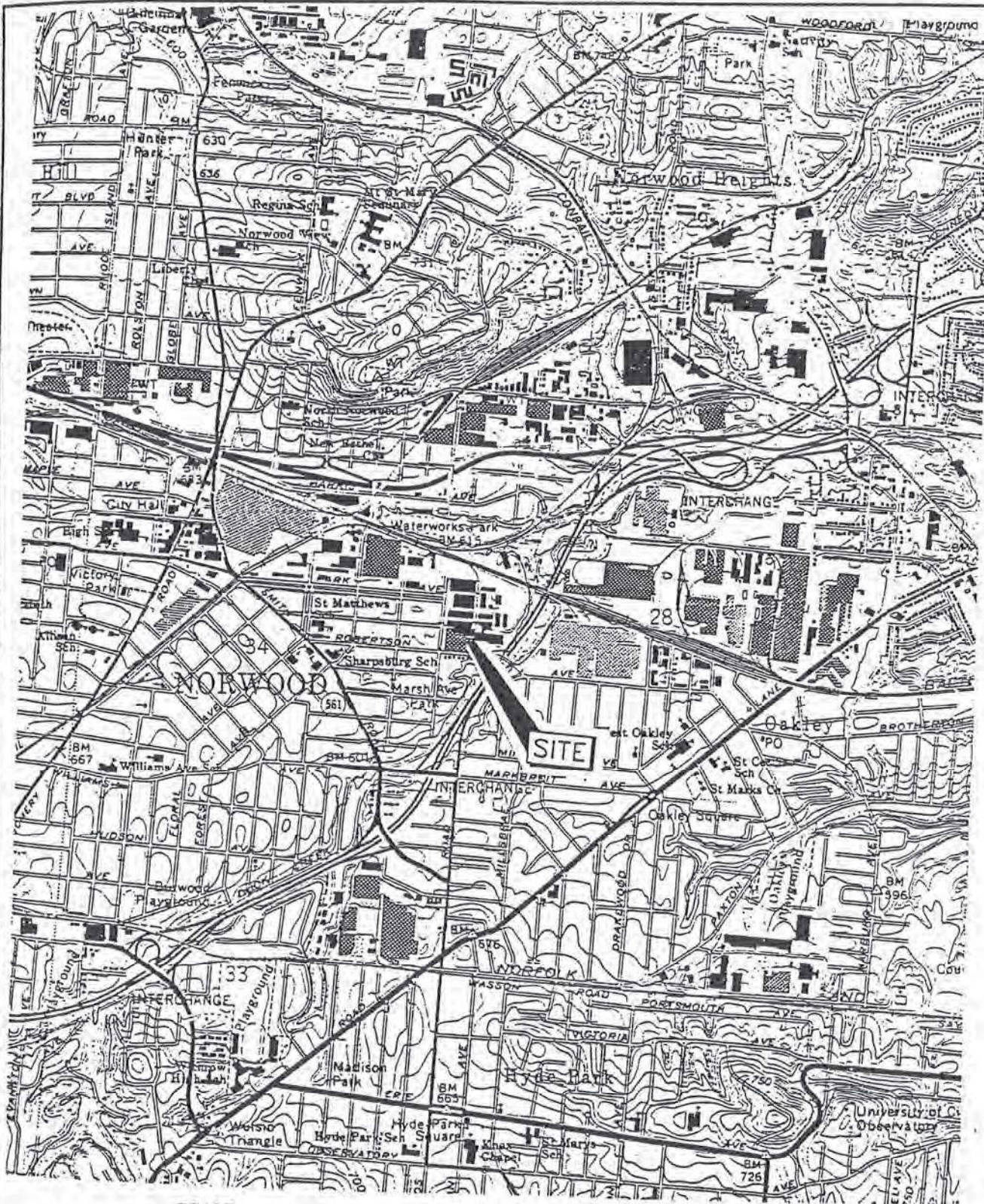
### *Regulatory Database Search*

*Appendix E*

*CERCLIS Records*

*Appendix A*

*Site Location Map and Facility Layout*

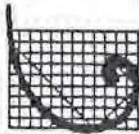


SCALE



QUADRANGLE LOCATION

SOURCE: CINCINNATI EAST, OHIO USGS QUADRANGLE



**ERM**

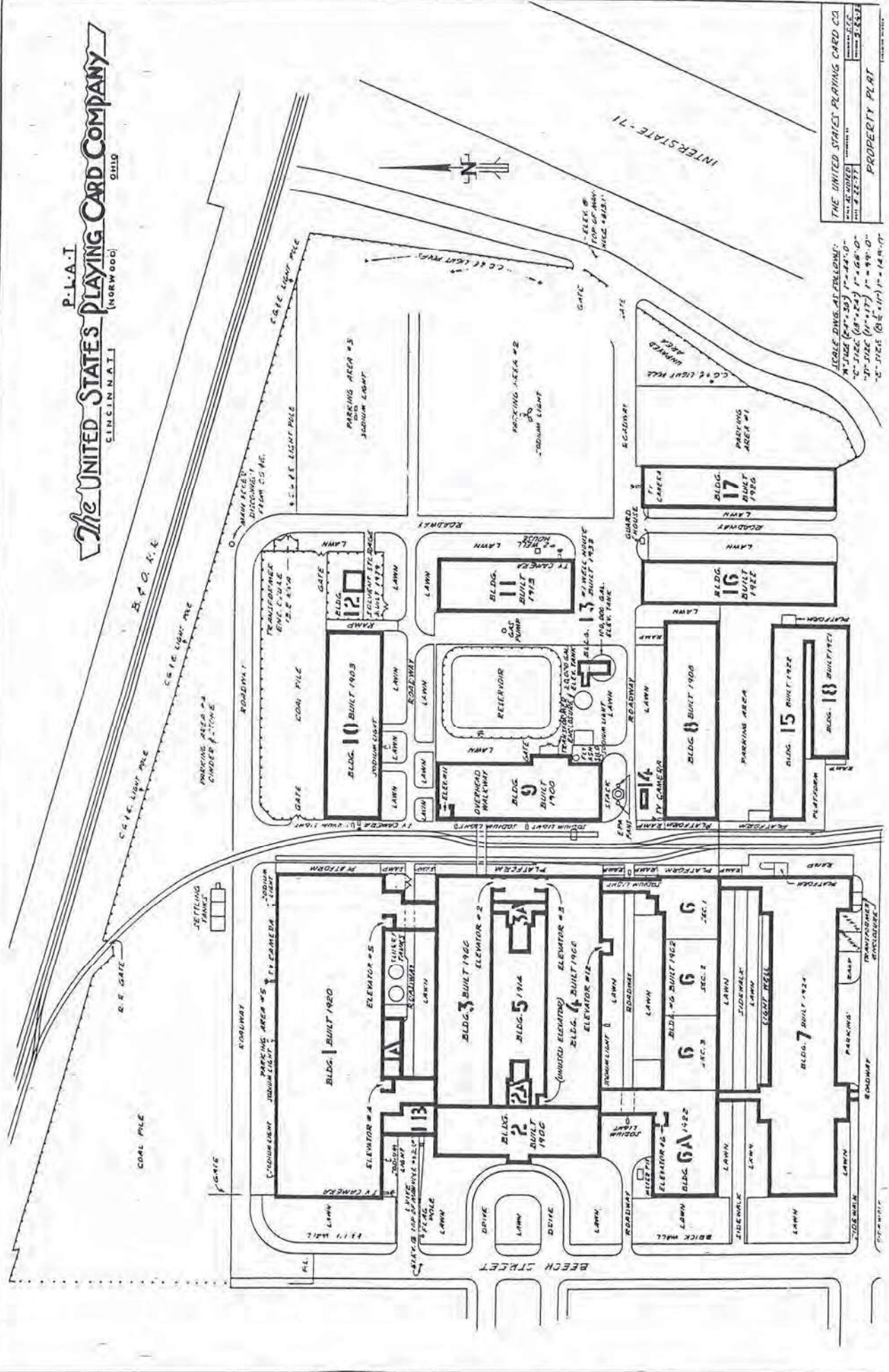
SITE LOCATION MAP  
UNITED STATES PLAYING CARD COMPANY  
NORWOOD, OHIO

**ERM-Midwest, inc.**  
Environmental Resources Management

FIGURE  
1

# **The UNITED STATES PLAYING CARD COMPANY** CINCINNATI, OHIO

P.L.A.T.

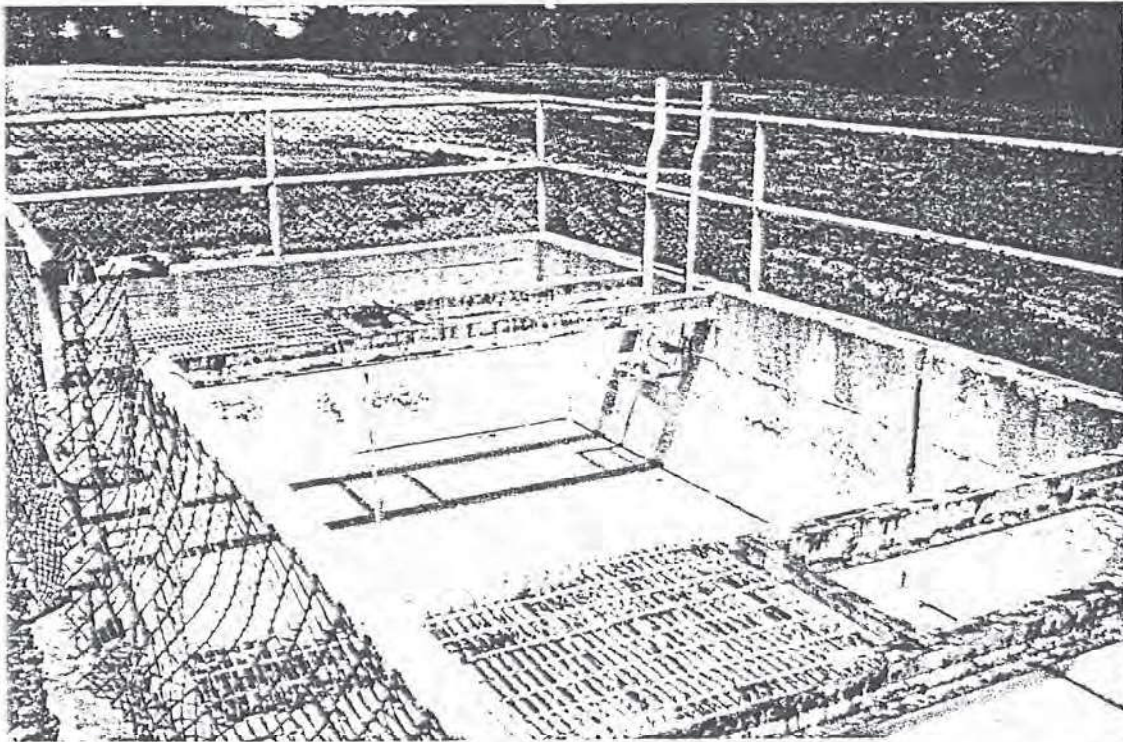


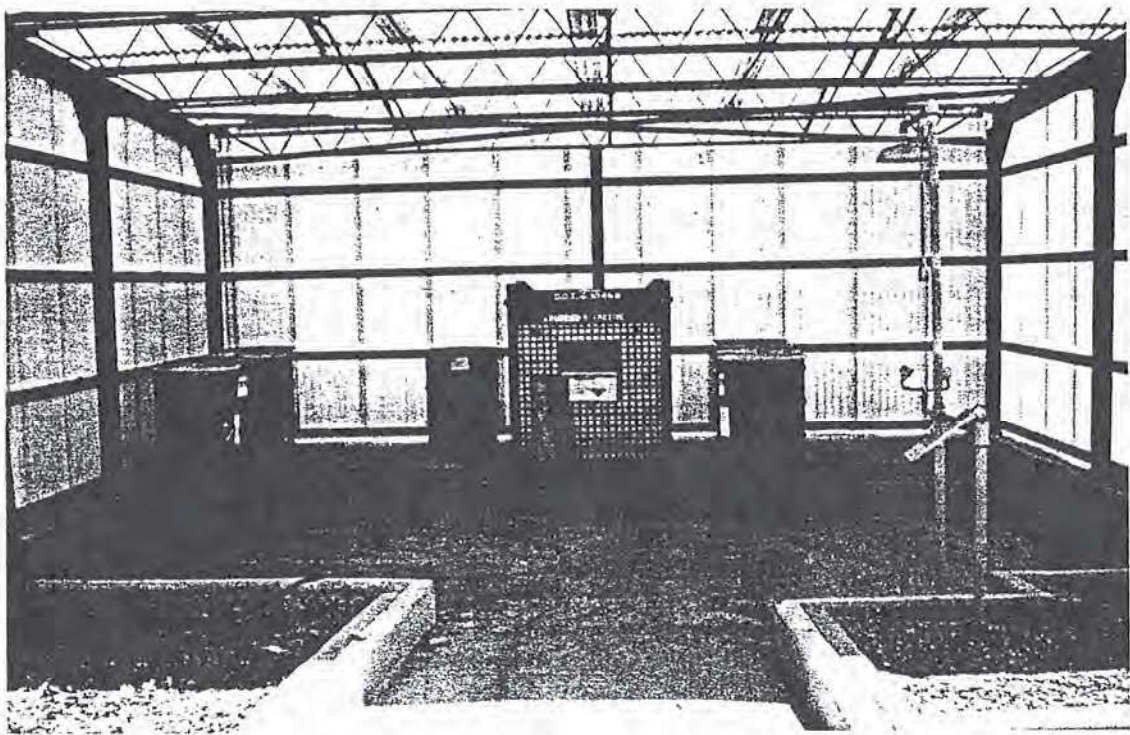
THE UNITED STATES PLAYING CARD CO.  
CINCINNATI, OHIO  
P.L.A.T.  
PROPERTY PLAT

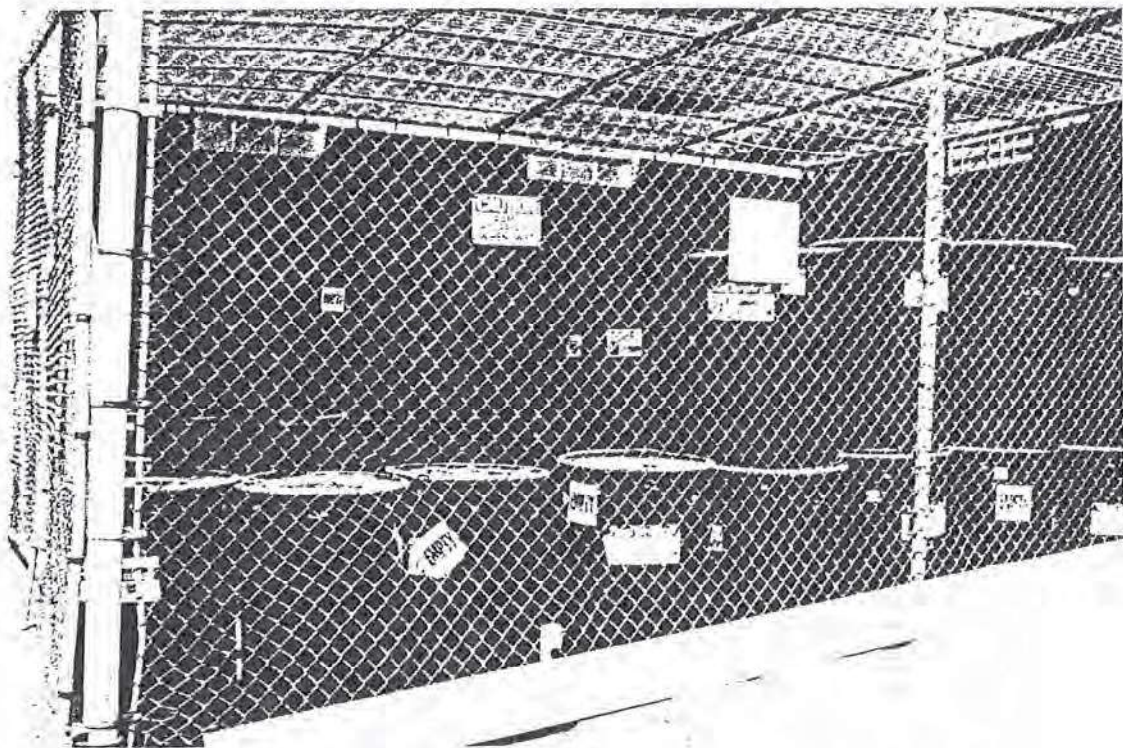
SCALE DIMS. AT BELOW:  
"A" SIZE (8 1/2" x 11") = 44'-0"  
"B" SIZE (11" x 17") = 66'-0"  
"C" SIZE (14" x 22") = 88'-0"  
"D" SIZE (17" x 27") = 110'-0"  
"E" SIZE (22" x 36") = 144'-0"

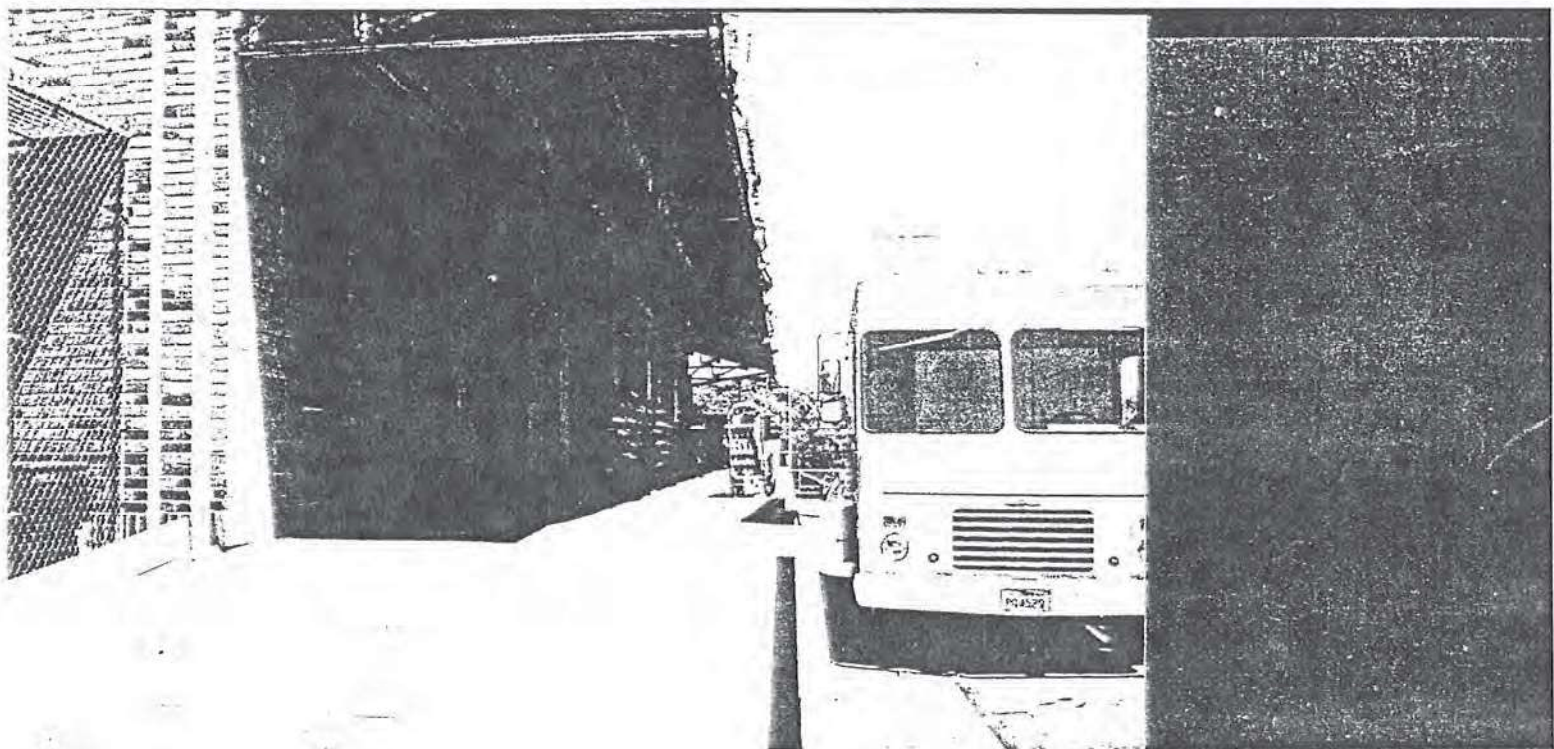
*Appendix B*

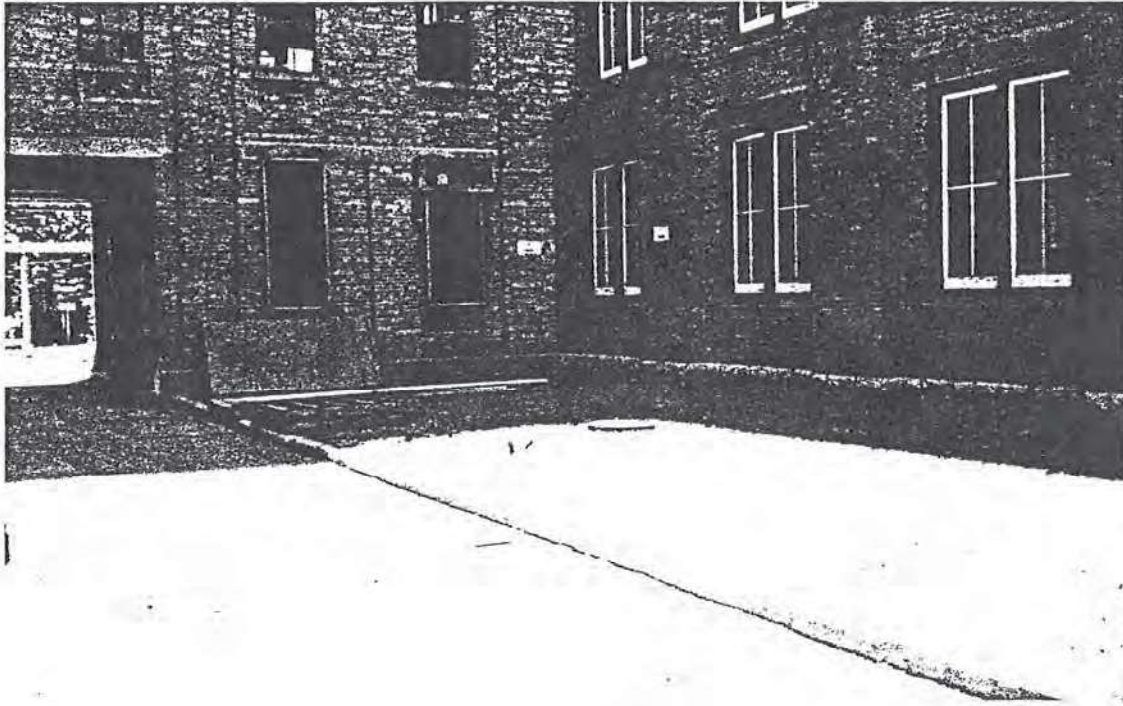
*Site Photographs*

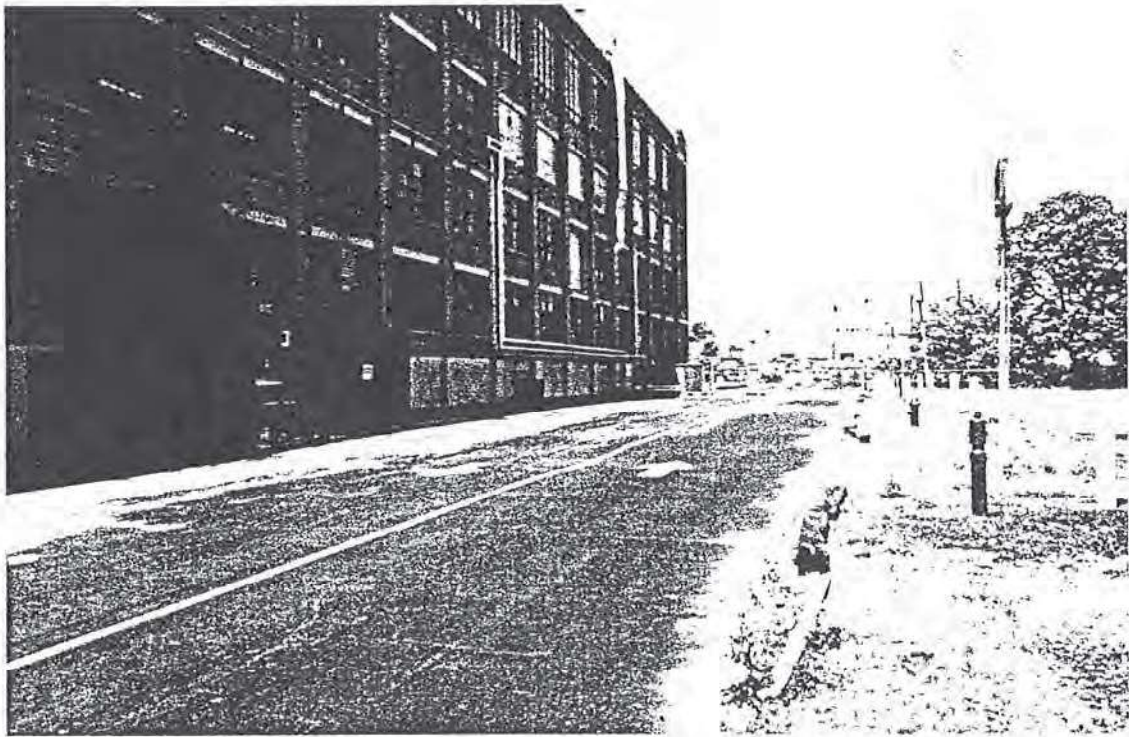


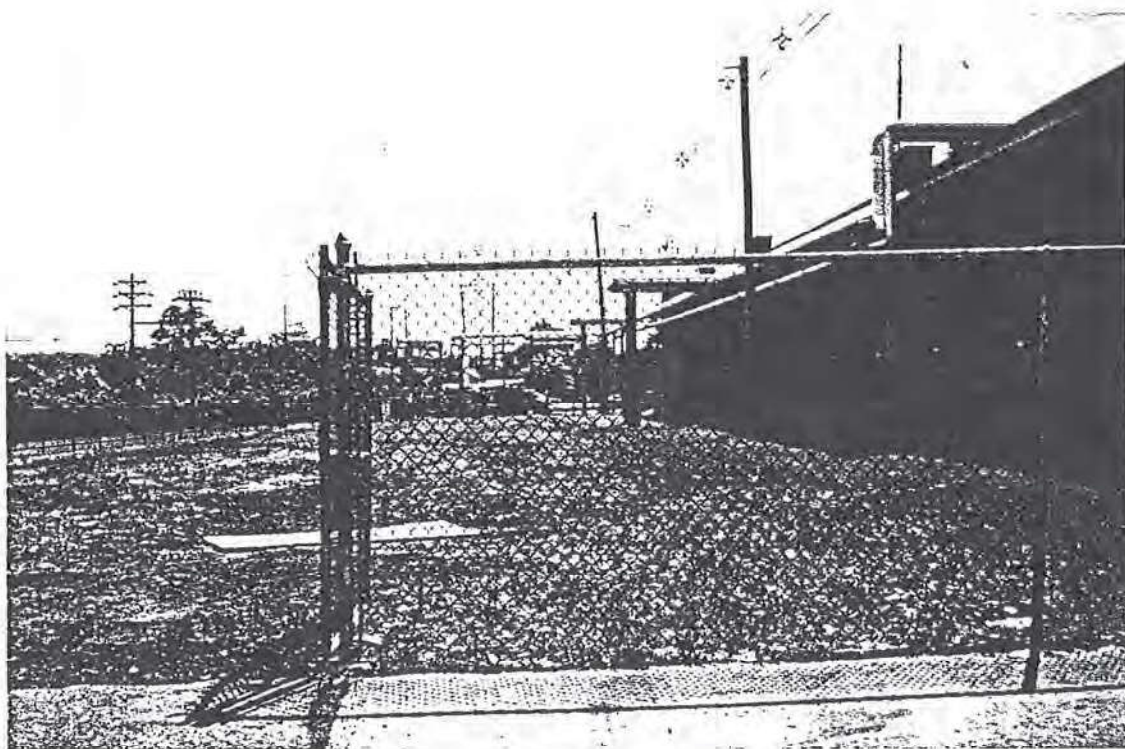






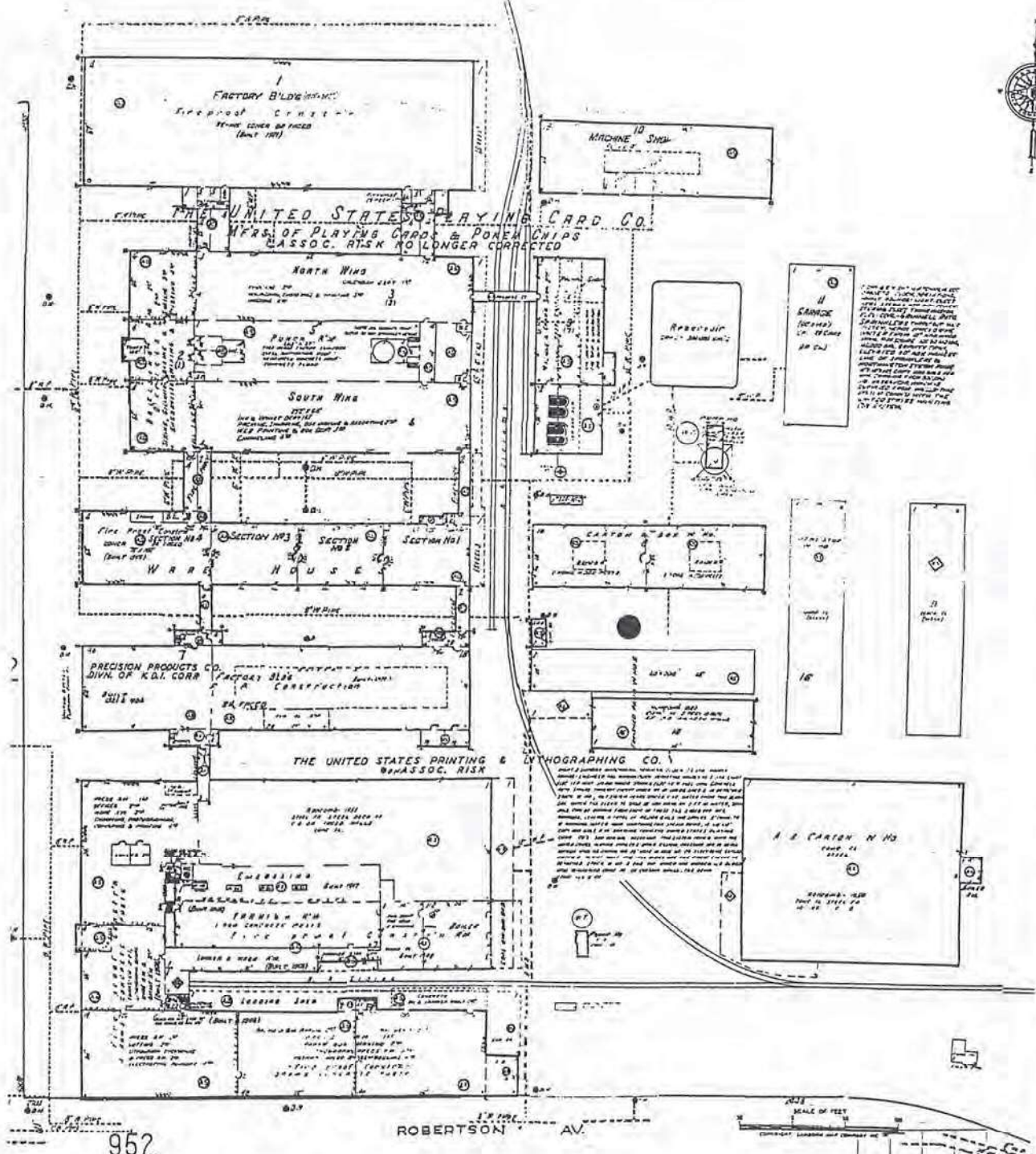






*Appendix C*

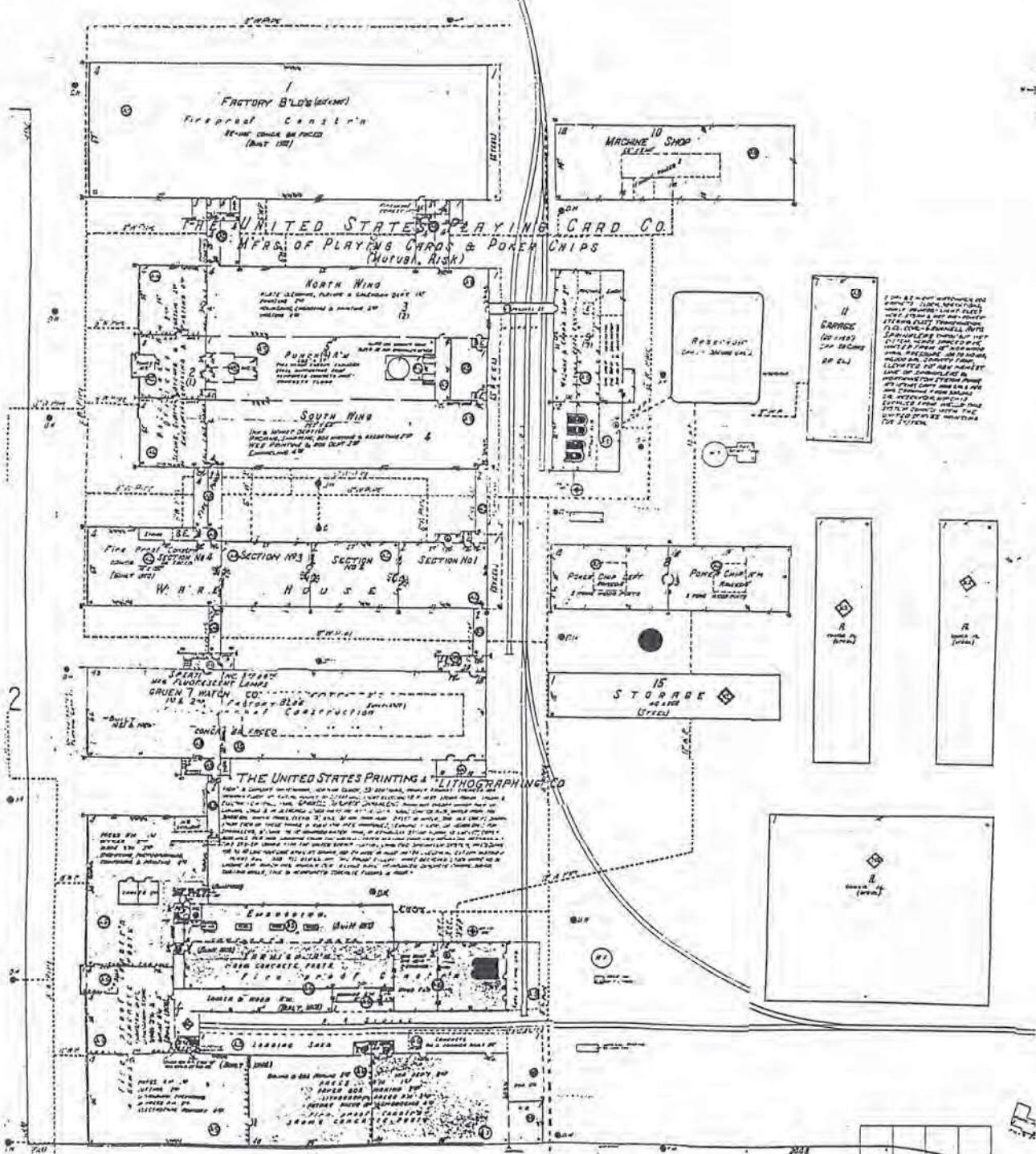
*Historical Records  
(Sanborn Maps)*



Environmental Risk Information & Imaging Services, Inc.  
1421 Prince Street ■ Suite 230 ■ Alexandria, VA 22314 ■ (703) 836-0402 ■ FAX (703) 836-0468

SANBORN MAPS™ by **ERIS**

JUN 10 1914  
NORWOOD



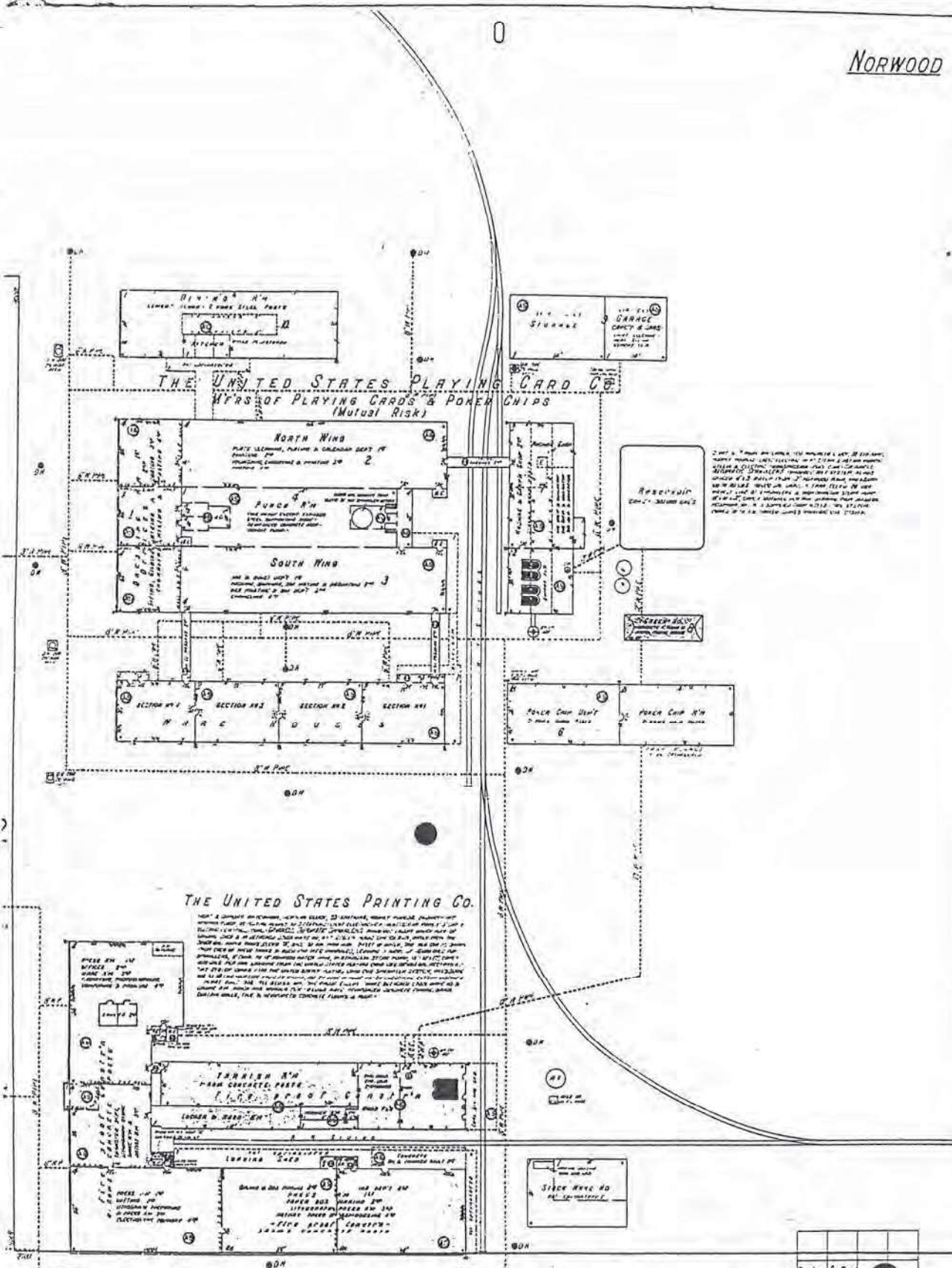
Environmental Risk Information & Imaging CORPORATION  
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SANBORN MAPS™ by ERIS

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1950

NORWOOD



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1917

**KEY**

Fire proof construction for fire-resistive construction

Adobe building

Stone building

Concrete, lime, sand or cement brick

Hollow concrete or cement block construction

Concrete or reinforced concrete construction

Tile building

Brick building with frame cornice

Brick building with frame side

Brick veneered building

Frame building, brick lined

Frame building, metal clad

Frame residential building

Iron building

Tenant building occupied by various manufacturing or occupations

Frame building covered with asbestos

Brick building with brick or metal cornice

Fire wall 6 inches above roof

Figures 8, 12, 16 indicate thickness of wall in inches

Wall without opening and size in inches

Wall with openings on floors as designated

Opening with single iron or tin clad door

Openings with wired glass doors

Drive or passage way

Stable

Auto House or private garage

Solid brick with interior walls of C.B. or C.B. and brick mixed

Mixed construction of C.B. and brick with one wall of solid brick

Mixed construction of C.B. and brick with one wall faced with 4" brick

Mixed construction of C.B. and brick throughout

Window opening, first story

Window opening, second and third stories

Window openings in second and fourth stories

Windows with wired glass

Windows with iron or tin clad shutters

Window openings tenth to twenty-second stories

Open elevator

Frame enclosed elevator

Concrete block enclosed elevator with traps

File enclosed elevator with self closing traps

Brick enclosed elev. with wired glass door

Ground elevation

Vertical steam boiler

Gasoline tank

Open under

Siamese fire dept. connection

Single fire dept. connection

Automatic fire alarm

Independent electric plant

Automatic sprinklers

Automatic chemical sprinklers

Automatic sprinklers in part of building only

Hot sprinklered

Outside vertical pipe on fire escape

Fire alarm box

Single hydrant

Double

Triple

Quadruple hydrant of the High Pressure Fire Service

Fire alarm box of the High Pressure Fire Service

Water pipes of the High Pressure Fire Service

High Pressure Fire Service as shown on key map

Water pipes of private supply

House numbers shown nearest to buildings are official or actually up on buildings

Old house numbers shown furthest from buildings

5 Block number

Vertical pipe or stand pipe

Automatic fire alarm

Independent electric plant

Automatic sprinklers

Automatic chemical sprinklers

Automatic sprinklers in part of building only

Hot sprinklered

Outside vertical pipe on fire escape

Fire alarm box

Single hydrant

Double

Triple

Quadruple hydrant of the High Pressure Fire Service

Fire alarm box of the High Pressure Fire Service

Water pipes of the High Pressure Fire Service

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House numbers shown nearest to buildings are official or actually up on buildings

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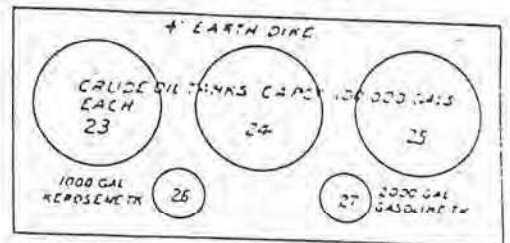
24 Reference to adjoining page

Fire engine house, as shown on key map

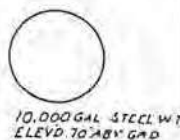
Fire pump

Under page number refers to corresponding page of previous edition

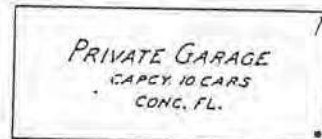
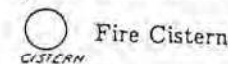
TANKS ○ Gasoline Tank



○ G.T.



FUEL OIL LINE



**CODING OF STRUCTURAL UNITS FOR FIREPROOF AND NON-COMBUSTIBLE BUILDINGS**

**FRAMING**  
**CODE STRUCTURAL UNIT**

- Reinforced Concrete Frame.
- Reinforced Concrete Joists, Columns, Beams, Trusses, Arches, Masonry Piers.
- Protected Steel Frame.
- Individually Protected Steel Joists, Columns, Beams, Trusses, Arches.
- Indirectly Protected Steel Frame.
- Indirectly Protected Steel Joists, Columns, Beams, Trusses, Arches.
- Unprotected Steel Frame.
- Unprotected Steel Joists, Columns, Beams, Trusses, Arches.
- Masonry Bearing Walls.

**FLOORS**

**CODE STRUCTURAL UNIT**

- Reinforced Concrete. Reinforced Concrete with Masonry Units. Pre-cast Concrete or Gypsum Slabs or Planks.
- Concrete on Metal Lath, Incombustible Form Boards, Paper-backed Wire Fabric, Steel Deck, and Cellular, Ribbed or Corrugated Steel Units.
- Open Steel Deck or Grating.

LAND USE CODE APPLICABLE TO CHANGES DIAGRAMMED AFTER 1962

R	RESIDENTIAL	M	MANUFACTURING
RT	RESIDENTIAL - TRANSIENT	P	PUBLIC OR INSTITUTIONAL
C	COMMERCIAL	U	UTILITY
W	WAREHOUSE	T	TRANSFORMATION

NUMERICAL PREFIX INDICATES THE NUMBER OF ESTABLISHMENTS IN EACH CATEGORY

**ROOF**

**CODE STRUCTURAL UNIT**

- Reinforced Concrete. Reinforced Concrete with Masonry Units. Reinforced Gypsum Concrete. Pre-cast Concrete or Gypsum Slabs or Planks.
- Concrete or Gypsum on Metal Lath, Incombustible Form Boards, Paper-backed Wire Fabric, Steel Deck, and Cellular, Ribbed or Corrugated Steel Units.
- Incombustible Composition Boards with or without Insulation. Masonry or Metal Tiles.
- Steel Deck, Corrugated Metal or Asbestos Protected Metal with or without Insulation.

The coding for framing, floor and roof structural units as shown above is used in describing the construction of fire-resistive buildings. In addition, reports for fire-resistive buildings will show the date built and wall construction when other than brick.

F P buildings have masonry floors and roof; concrete and/or directly or indirectly protected steel framing; and clay brick, stone or poured concrete walls.

F P X buildings are F P buildings with inferior walls such as concrete block, cement brick, metal or glass panels, etc.

N C buildings have unprotected steel framing and fire-resistive but non-masonry floors and roof.

F P-1962  
(C.B.)  
A-1-a

A fire-resistive building built in 1962 with concrete walls and reinforced concrete frame, floors and roof.

F P X-1962  
(METAL PANELS)  
E-2-b  
NONCOMB. CEIL.

A fire-resistive building built in 1962 with metal panel walls, indirectly protected steel frame, concrete floors and roof on metal lath, noncombustible ceilings.

N C-1962  
(C.B.)  
H-2-d

A noncombustible building built in 1962 with concrete block walls; unprotected steel columns and beams; concrete floors on metal lath and steel deck roof.

# SANBORN MAP LEGEND

CODING OF FIRE-RESISTIVE STRUCTURAL UNITS FOR FIREPROOF AND NON-COMBUSTIBLE BUILDINGS

FRAMING		FLOORS		ROOF	
CODE	STRUCTURAL UNIT	CODE	STRUCTURAL UNIT	CODE	STRUCTURAL UNIT
A.	Reinforced Concrete Frame.	1.	Reinforced Concrete, Reinforced Concrete with Masonry Units, Precast Concrete or Gypsum Slabs or Planks.	a.	Reinforced Concrete, Reinforced Concrete with Masonry Units, Reinforced Gypsum Concrete, Precast Concrete or Gypsum Slabs or Planks.
B.	Reinforced Concrete Joists, Columns, Beams, Trusses, Arches, Masonry Piers.	2.	Concrete on Metal Lath, Incombustible Form Boards, Paper-backed Wire Fabric, Steel Deck, or Cellular, Ribbed or Corrugated Steel Units.	b.	Concrete or Gypsum on Metal Lath, Incombustible Form Boards, Paper-backed Wire Fabric, Steel Deck, or Cellular, Ribbed or Corrugated Steel Units.
C.	Protected Steel Frame.	3.	Open Steel Deck or Grating.	c.	Incombustible Composition Boards with or without Insulation, Masonry or Metal Tiles.
D.	Individually Protected Steel Joists, Columns, Beams, Trusses, Arches.			d.	Steel Deck, Corrugated Metal or Asbestos Protected Metal with or without Insulation.
E.	Indirectly Protected Steel Frame.				
F.	Indirectly Protected Steel Joists, Columns, Beams, Trusses, Arches.				
G.	Unprotected Steel Frame.				
H.	Unprotected Steel Joists, Columns, Beams, Trusses, Arches.				
I.	Masonry Bearing Walls only.				

The coding is left, for framing, floor and roof structural units is used in describing the construction of fire-resistive buildings. In addition, reports for fire-resistive buildings will show the date built, wall construction other than brick, and ceilings.

**FP-1962**  
(CONC)  
A-1-a

A fireproof building built in 1962 with concrete walls and reinforced concrete frame, floors and roof.

**FPX-1962**  
(METAL PANELS)  
B-2-a

A fireproof building built in 1962 with metal panel walls, reinforced concrete columns and beams, concrete floors on metal lath and gypsum slab roof; non-combustible ceilings.

**NC-1962**  
(C.B.)  
H-2-d

A noncombustible building built in 1962 with concrete block walls, unprotected steel columns, beams and joists, concrete floors on metal lath and steel deck roof.

## GLOSSARY

**A-B LINE** An arbitrary boundary between adjoining sheets.  
**A.G.** Attached.  
**A.P.A.** Equipped with fire detecting devices which automatically signal central fire department.  
**ARCH** An arching system employing arches through floors.  
**ASBESTOS** A masonry wall extending from first floor foundation.  
**ASBESTOS** Risk not underwritten by New York Fire Ins. Companies.  
**BASEMENT** A story having its floor below ground & its ceiling at least 4' above ground.  
**CLACK** County, N.Y. A floor of a building below the first floor. Shown by the symbol H following story height. Stairways or subterranean passages below the first basement, are shown by the symbol SB following basement symbol.  
**CHIMNEY** (Asbestos tile masonry in New York Mountain & Pacific Coast States)  
**CL** Brick, stone, concrete brick & concrete chimneys.  
**C.B.** Concrete block chimney.  
**C.P.** Non-standard concrete chimney.  
**P.P.** Patent chimney.  
**IL** Iron chimney.  
**SL** Stone pipe.  
**S.V.** Stone pipe with patent ventilator.

## MASONRY CONSTRUCTION

Important interior and all exterior masonry walls of all non-residential buildings and residential buildings of five or more dwelling units are shown with weight (—) lines.

Masonry walls of residential buildings of four dwelling units or less are shown with a standard line and the construction is noted on all buildings diagrammed after July, 1962.

WALLS		PARTITIONS		OPENINGS	
				(Interior)	(Exterior)
8" Brick	Mixed Construction of Concrete Blocks, Brick Faced	Frame	Wall with No Openings	Wall with Double Standard Fire Doors 1st Floor	1st Floor
12" Concrete	Mixed Construction of Concrete Blocks & Brick	Tile from Foundation to Top Ceiling only.	Wall with Standard Fire Door Basement	Wall with Substandard Fire Doors 1st & 2nd Floors	1st & 2nd Floors
18" & 20" Stone	Masonry Walls, Metal Faced	Concrete 1st Floor only	Wall with Metal & Wired Glass Fire Doors All Floors	Wall with Substandard Fire Doors 1st, 2nd & 3rd Floors	3rd Floor
12" & 8" Hollow Tile Wall Thicknesses Placed Relative to Respective Floors	Adobe	Hollow Cinder or Concrete Block 1st Floor only	Wall with Substandard Fire Doors 1st, 2nd & 3rd Floors & Unprotected Opening 4th Floor	Wall with Small Unprotected Openings only	1st & 4th Fl. with Metal Shutter 1st.
Cinder, Concrete or Cement Brick	Hollow Cinder or Concrete Block Interior Wall Basement to Roof	Brick 2nd Floor only	Wall with Unprotected Openings All Floors		10th & 22nd only
Hollow Cinder or Concrete Blocks, Protected	Tile Interior Wall Basement to Roof	Tile 1st & 2nd Floors only			10th to 22nd Fl.
	Cement Brick End Wall				Glass Block

## NON-MASONRY CONSTRUCTION

Non-masonry walls are shown with fine (—) lines. (Wall construction other than wood and stone on wood frame is noted)

Wood & Stone & Plaster, Etc. on Wood Frame	Wood Sash & Glass	Iron Building with Wood Roof, (Location of Extensive Wood Areas Specifically noted)	Apron Walls, With Wood Sash and Glass	Asphalt and/or Asbestos Protected Metal on Steel Frame
Brick Veneered on Wood Frame (Other Types of Veneered on Wood Frame Specifically noted)	Metal Sash & Glass	Asbestos Clad on Wood Frame, (Noted in Non-Residential Structures only)	Succo, Cement Plaster, Etc. on Steel Frame	Asphalt and/or Asbestos Protected Metal on Wood Frame
Mixed Masonry & Non-Masonry (Type of Masonry Specifically noted)	Metal Clad on Wood Frame	Mixed Wall—9" of CH With Metal Sash Above	Gunter on Steel Frame	Glass Panels
Wood, Brick Lined, Re-Filled or Brick Nogged	Iron Building	Metal Panels		

## FIRE PROTECTION

Fire Department Connection	Single Hydrant
Automatic Sprinklers throughout contiguous sections of single risk	Double Hydrant
Automatic Sprinklers all floors of building	Triple Hydrant
Automatic Sprinklers in part of building only (Note under symbol indicates protected portion of building)	Quadruple Hydrant of the High Pressure Service
Not Sprinklered	Water Pipes of the High Pressure Service as Shown in Key Map
Automatic Chemical Sprinklers	Public Water Service
Chemical Sprinklers in part of building only (Note under symbol indicates protected portion of building)	Private Water Service
Vertical Pipe or Stand Pipe	
Automatic Fire Alarm	
Water Tank	
Outside Vertical Pipe on fire escape	
Fire Alarm Box	
Note "H.P.S." on High Pressure Fire Service	

Frame Enclosed Elevator with Self Closing Traps	Frame Enclosed Elevator with Self Closing Traps
Concrete Block Enclosed Elevator with Traps	Concrete Block Enclosed Elevator with Self Closing Traps
Tile Enclosed Elevator with Self Closing Traps	Brick Enclosed Elevator with Wired Glass Floor
Open Hoist	Open Hoist with Traps
Open Hoist Basement to 1st	Stairs
	MISCELLANEOUS
	Number of Stories Height in Feet
	Computation Roof Covering
	Parapet 6" above Roof
	Parapet 12" above Roof
	Parapet 24" above Roof
	Parapet 48" above Roof
	Parapet 60" above Roof
	Parapet 72" above Roof
	Parapet 84" above Roof
	Parapet 96" above Roof
	Parapet 108" above Roof
	Parapet 120" above Roof
	Parapet 132" above Roof
	Parapet 144" above Roof
	Parapet 156" above Roof
	Parapet 168" above Roof
	Parapet 180" above Roof
	Parapet 192" above Roof
	Parapet 204" above Roof
	Parapet 216" above Roof
	Parapet 228" above Roof
	Parapet 240" above Roof
	Parapet 252" above Roof
	Parapet 264" above Roof
	Parapet 276" above Roof
	Parapet 288" above Roof
	Parapet 300" above Roof
	Parapet 312" above Roof
	Parapet 324" above Roof
	Parapet 336" above Roof
	Parapet 348" above Roof
	Parapet 360" above Roof
	Parapet 372" above Roof
	Parapet 384" above Roof
	Parapet 396" above Roof
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	Parapet 1272" above Roof
	Parapet 1284" above Roof
	Parapet 1296" above Roof
	Parapet 1308" above Roof
	Parapet 1320" above Roof
	Parapet 1332" above Roof
	Parapet 1344" above Roof
	Parapet 1356" above Roof
	Parapet 1368" above Roof
	Parapet 1380" above Roof
	Parapet 1392" above Roof
	Parapet 1404" above Roof
	Parapet 1416" above Roof
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	Parapet 1440" above Roof
	Parapet 1452" above Roof
	Parapet 1464" above Roof
	Parapet 1476" above Roof
	Parapet 1488" above Roof
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	Parapet 1524" above Roof
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	Parapet 1560" above Roof
	Parapet 1572" above Roof
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	Parapet 1608" above Roof
	Parapet 1620" above Roof
	Parapet 1632" above Roof
	Parapet 1644" above Roof
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	Parapet 1704" above Roof
	Parapet 1716" above Roof
	Parapet 1728" above Roof
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	Parapet 1812" above Roof
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	Parapet 1932" above Roof
	Parapet 1944" above Roof
	Parapet 1956" above Roof
	Parapet 1968" above Roof
	Parapet 1980" above Roof
	Parapet 1992" above Roof
	Parapet 2004" above Roof
	Parapet 2016" above Roof
	Parapet 2028" above Roof
	Parapet 2040" above Roof
	Parapet 2052" above Roof
	Parapet 2064" above Roof
	Parapet 2076" above Roof
	Parapet 2088" above Roof
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	Parapet 2112" above Roof
	Parapet 2124" above Roof
	Parapet 2136" above Roof
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	Parapet 2160" above Roof
	Parapet 2172" above Roof
	Parapet 2184" above Roof
	Parapet 2196" above Roof
	Parapet 2208" above Roof
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	Parapet 2232" above Roof
	Parapet 2244" above Roof
	Parapet 2256" above Roof
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	Parapet 2328" above Roof
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	Parapet 2412" above Roof
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	Parapet 2988" above Roof
	Parapet 3000" above Roof

2 Stories & Basement  
1st Floor Occupied by Store  
2 Residential Units above 1st  
Auto in Basement  
Drive or Passageway  
Wood Shingle Roof

Iron Chimney

☒ Brick Chimney

Iron Chimney

☐ Gasoline Tank

(with Spark Arrestor)

Vertical Steam Boiler

☒ Fire Pump

Horizontal Steam Boiler

Width of Street between Block

Lines, not Curv Lines

Ground Elevation

House numbers nearest to Building  
are *Correct* or Actually up on Build-  
ings. Old House Numbers are  
Farthest from Buildings

24

Reference to Adjoining Page

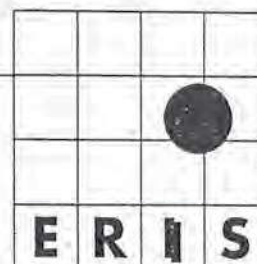
5 Block  
Number

+ Fire Department as shown on Key Map

Vac. or V. - Vacant

*Appendix D*

*Regulatory Database Search*



**PERTAINING TO:** CINCINNATI, OH 45212

**ON BEHALF OF:** ERM-MIDWEST, INC.  
450 W. WILSON BRIDGE ROAD  
SUITE 100  
WORTHINGTON, OH 43085

**PREPARED ON:** 05/31/1994

**REPORT NUMBER:** 49603

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## ERIIS REPORT OVERVIEW

The following features are available for an ERIIS report:

- \* Database Report
  - \* Statistical Profile
  - \* Database Records
- \* Related Maps
  - \* Digital Custom Plotted Map
  - \* Sanborn Fire Insurance Map(s)
  - \* Topographical Map(s)

### Statistical Profile

The statistical profile is an at-a-glance numeric summary of the databases searched for your ERIIS Report.

### Database Records

The detailed federal and state database information indicates potential and actual environmental threats within the study radius. These records are sorted by their distance from the study site.

### Digital Custom Map

The digital custom map is cross referenced with the database records. The cross-in-circle in the center of the map represents the study site. The red circles represent distances from the study site. The plottable sites in the report are distinguished on the map by symbols of different shape and color.

### Sanborn Fire Insurance Maps

The ERIIS collection of historical Sanborn Fire Insurance Maps covers 14,000 cities and towns. These maps may indicate prior use of the study site. If no maps are available for the study site, a notice to that effect is included. This notice should serve as evidence of due diligence.

### Topographical Map

USGS topographical maps show natural and man-made features as well as the shape and elevation of the terrain. The 7.5 minute quad maps are produced at a scale of 1:24,000, or one inch represents 2,000 feet.

If you have any questions about this report,  
please contact ERIIS Customer Service at 1-800-989-0402

ERIIS ASTM STATISTICAL PROFILE  
State: OH

ERIIS Report #49603

May 31, 1994

Site:

CINCINNATI, OH 45212

<u>Database</u>	<u>Radius (Mi)</u>	<u>Property</u>	<u>Property-1/4</u>	<u>1/4-1/2</u>	<u>1/2-1</u>	<u>&gt; 1</u>	<u>TOTAL</u>
NPL	1	NO	0	0	0		0
CERCLIS	.5	NO	1	1			2
TRI	.5	NO	1	2			3
RCRIS_TS	1	NO	0	0	0		0
RCRIS_LG	.25	NO	0				0
RCRIS_SG	.25	NO	1				1
ERNS	.005	NO	0				0
UST	.25	NO	0				0
LUST	.5	NO	0	10			10
SWF	.5	NO	0	0			0
MSITES	1	NO	1	2	1		4
			<u>4</u>	<u>15</u>	<u>1</u>	<u>0</u>	<u>20</u>

Selection of PROPERTY records requires an accurate street address in the ERIIS job order.

A blank radius count indicates that the database was not searched by this radius per client instructions.

NR in a radius count indicates that the database cannot be reported by this search criteria due to insufficient and/or inaccurate addresses reported by a federal/state agency.

# ERIIS DATABASE DESCRIPTIONS

Database: CERCLIS Date: 04/01/1994  
Source Agency: US Environmental Protection Agency

Office Of Solid Waste And Emergency Response  
202/260-2131  
Phone:  
Description: Comprehensive Environmental Response, Compensation, And Liability Information System.  
The CERCLIS List Is A Compilation Of Known Or Suspected Uncontrolled Or Abandoned Hazardous Waste Sites. These Sites Have Either Been Investigated, Or Are Currently Under Investigation By The EPA For The Release, Or Threatened Release Of Hazardous Substances. Once A Site Is Placed In CERCLIS, It May Be Subjected To Several Levels Of Review And Evaluation And Ultimately Placed On The National Priorities List.

Database: DOCKET Date: 12/28/1993  
Source Agency: US Environmental Protection Agency

Office Of Enforcement  
202/260-2614  
Phone:  
Description: Civil Enforcement Docket.  
The Civil Enforcement Docket Is The U.S. Environmental Protection Agency's System For Tracking Civil Judicial Cases Filed On The Agency's Behalf By The Department Of Justice. This Report Contains Information On Cases From 1972 To The Present.

Database: ERNS Date: 12/31/1993  
Source Agency: US Environmental Protection Agency

Office Of Solid Waste And Emergency Response  
202/260-2342  
Phone:  
Description: Emergency Response Notification System - 1993.  
ERNS Is A National Computer Database System That Is Used To Store Information On The Sudden And/Or Accidental Release Of Hazardous Substances, Including Petroleum, Into The Environment. The ERNS Reporting System Contains Preliminary Information On Specific Releases, Including The Spill Location, The Substance Released, And The Responsible Party. Please Note That The Information In The ERNS Report Pertains Only To Those Releases That Occured During 1993.

Database: FINDS Date: 03/22/1994  
Source Agency: US Environmental Protection Agency

Office Of Information Resources Management  
202/260-4465  
Phone:  
Description: Facility Index System.  
The Finds Report Is A Computerized Inventory Of All Facilities That Are Regulated Or Tracked By The U.S. Environmental Protection Agency. These Facilities Are Assigned An Identification Number Which Serves As A Cross-Reference For Other Databases In The EPA's Program System. Each Finds Record Indicates The EPA Program Office That Is Responsible For The Tracking Of The Facility.

Database: NPL Date: 04/01/1994  
Source Agency: US Environmental Protection Agency

Office Of Solid Waste And Emergency Response  
202/260-3046  
Phone:  
Description: National Priorities List.  
The NPL Report, Also Known As The Superfund List, Is An EPA Listing Of Uncontrolled Or Abandoned Hazardous Waste Sites. The List Is Primarily Based On A Score That A Site Receives From The EPA's Hazardous Ranking System. These Sites Are Targeted For Possible Long-Term Remedial Action Under The Superfund Act.

Database: NUCLEAR Date: 01/01/1993  
Source Agency: US Nuclear Regulatory Commission

Permits Section  
301/492-7000  
Phone:  
Description: Nuclear Power Facilities.  
The Nuclear Report Is A Comprehensive Listing Of All Licensed

# ERIIS DATABASE DESCRIPTIONS

And Active Nuclear Power Plants In The United States.

Database:	OPENDUMP	Date:	01/01/1990
Source Agency:	US Environmental Protection Agency		
Phone:	Office Of Solid Waste And Emergency Response		
Description:	202/260-4687 Open Dumps Report. The Resource Conservation And Recovery Act Defines The Term "Open Dump" To Mean "...Any Facility Or Site Where Solid Waste Is Disposed Of Which Is Not A Sanitary Landfill Which Meets The Criteria Promulgated Under Section 4004 And Which Is Not A Facility For The Disposal Of Hazardous Waste." Thus, Any Facility Which Fails To Comply With Any One Element Of The Criteria Is Considered To Be An Open Dump.		
Database:	RCRIS_LG	Date:	08/03/1993
Source Agency:	US Environmental Protection Agency		
Phone:	Office Of Solid Waste And Emergency Response		
Description:	202/260-2603 Resource Conservation And Recovery Information System - Large Quantity Generators. The RCRIS_LG Report Contains Information Pertaining To Facilities That Either Generate More Than 1000kg Of Hazardous Waste Per Month Or Meet Other Applicable Requirements Of The Resource Conservation And Recovery Act. Information Pertaining To The Status Of Facilities Tracked By The RCRA Administrative Action Tracking System (RAATS) Is Included In The RCRIS_LG Report.		
Database:	RCRIS_SG	Date:	08/03/1993
Source Agency:	US Environmental Protection Agency		
Phone:	Office Of Solid Waste And Emergency Response		
Description:	202/260-2603 Resource Conservation And Recovery Information System - Small Quantity Generators. The RCRIS_SG Report Contains Information Pertaining To Facilities That Either Generate Between 100kg And 1000kg Of Hazardous Waste Per Month Or Meet Other Applicable Requirements Of The Resource Conservation And Recovery Act. Information Pertaining To The Status Of Facilities Tracked By The RCRA Administrative Action Tracking System (RAATS) Is Included In The RCRIS_SG Report.		
Database:	RCRIS_TS	Date:	08/03/1993
Source Agency:	US Environmental Protection Agency		
Phone:	Office Of Solid Waste And Emergency Response		
Description:	202/260-2603 Resource Conservation And Recovery Information System - Treatment, Storage, And Disposal Facilities. The RCRIS_TS Report Contains Information Pertaining To Facilities That Either Treat, Store, Or Dispose Of Hazardous Waste. Information Pertaining To The Status Of Facilities Tracked By The RCRA Administrative Action Tracking System (RAATS) Is Included In The RCRIS_TS Report.		
Database:	TRI	Date:	12/31/1992
Source Agency:	US Environmental Protection Agency		
Phone:	Office Of Pollution Prevention And Toxics		
Description:	202/260-3757 Toxic Release Inventory System Of 1992. The TRI Report Contains Information On The Industrial Release And/Or Transfer Of Toxic Chemicals As Reportable Under Title III Of The Superfund Amendments And Reauthorization Act Of 1986 (Sara Title III).		

# ERIIS DATABASE DESCRIPTIONS

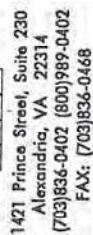
Database:	LUST	Date:	02/04/1994
Source Agency:	OH Office Of The State Fire Marshal Bureau Of Underground Storage Tanks		
Phone:	614/752-7938		
Description:	The Ohio LUST Report (Formerly The Petroleum Underground Storage Tank Release Incident Report, Or PUSTR) Is A Comprehensive Listing Of All Reported Leaking Underground Storage Tanks Located Within The State Of Ohio.		
Database:	MSITES	Date:	07/01/1993
Source Agency:	OH Environmental Protection Agency Emergency And Remedial Response Division		
Phone:	614/644-2924		
Description:	The Ohio Master Sites List Tracks Sites In Ohio Where Hazardous Waste Has Been Found Or Where There Are Any Known, Suspected, Or Likely Release Of Such Wastes From A Facility.		
Database:	SWF	Date:	04/12/1993
Source Agency:	OH Environmental Protection Agency Division Of Solid Waste Management		
Phone:	614/644-3135		
Description:	The Ohio Solid Waste Facility List Contains Information Pertaining To All Permitted Solid Waste Landfills And Processing Facilities Operating Within The State Of Ohio.		
Database:	UST	Date:	11/11/1993
Source Agency:	OH Office Of The State Fire Marshal Bureau Of Underground Storage Tanks		
Phone:	614/644-7938		
Description:	The Ohio UST List Is A Comprehensive Listing Of All Registered Underground Storage Tanks Located Within The State Of Ohio.		

ERIIS SUMMARY OF RADIUS SITES

ERIIS Report #49603

May 31, 1994

ERIIS ID.	FACILITY/ADDRESS	DATABASE	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
39001000190	UNITED STATES PLAYING CARD CO PARK AVE & BEECH ST CINCINNATI, OH 45212 COUNTY: HAMILTON	CERCLIS	0.098 Mi	NORTHWEST	190
39008000475	UNITED STATES PLAYING CARD CO PARK AVE AND BEECH ST CINCINNATI, OH 45212 COUNTY: HAMILTON	RCRIS_SG	0.098 Mi	NORTHWEST	475
39050000465	UNITED STATES PLAYING CARD CO PARK AVE & BEECH ST CINCINNATI, OH 45212 COUNTY: HAMILTON	MSITES	0.098 Mi	NORTHWEST	465
39009001306	DINAGRAPHICS BEECH & ROBERTSON ST. NORWOOD, OH 45212 COUNTY: HAMILTON	TRI	0.102 Mi	SOUTHWEST	1306
39005000531	FORMER ED & FRANK MOTORS 2795 ROBERTSON AVE CINCINNATI, OH 45209-1247 COUNTY: HAMILTON	LUST	0.302 Mi	SOUTHEAST	531
39009001311	SIEMENS ENERGY & AUTOMATI 4620 FOREST AVE NORWOOD, OH 45212-3306 COUNTY: HAMILTON	TRI	0.311 Mi	NORTHWEST	1311
39005000556	SIEMENS ENERGY & AUTOMATIO 4620 FOREST AVE NORWOOD, OH 45212-3306 COUNTY: HAMILTON	LUST	0.311 Mi	NORTHWEST	556
39005000570	LUKA 3004 HARRIS AVE NORWOOD, OH 45212-2404 COUNTY: HAMILTON	LUST	0.313 Mi	NORTHEAST	570
39005000528	UNITED DAIRY FARMERS 075 4344 SMITH RD CINCINNATI, OH 45212-4237 COUNTY: HAMILTON	LUST	0.354 Mi	SOUTHWEST	528
39005000506	BP 08942 4004 EDWARDS RD CINCINNATI, OH 45209-1612 COUNTY: HAMILTON	LUST	0.376 Mi	SOUTHWEST	506
39005000505	SUPER AMERICA 2713 WILLIAMS AVE NORWOOD, OH 45209-1951 COUNTY: HAMILTON	LUST	0.389 Mi	SOUTHWEST	505
39009001316	SHEPHERD CHEMICAL CO. 4900 BEECH ST CINCINNATI, OH 45212-2316 COUNTY: HAMILTON	TRI	0.430 Mi	NORTHWEST	1316
39050000110	SHEPHERD CHEMICAL CO 4900 BEECH ST NORWOOD, OH 45212-2316 COUNTY: HAMILTON	MSITES	0.431 Mi	NORTHWEST	110
39005000587	JH DAY CO 4932 BEECH ST CINCINNATI, OH 45212-2316 COUNTY: HAMILTON	LUST	0.457 Mi	NORTHWEST	587
39005000525	OAKLEY COMMERCE CENTER 2950 ROBERTSON AVE CINCINNATI, OH 45209-1202 COUNTY: HAMILTON	LUST	0.457 Mi	SOUTHEAST	525
39001000375	DEE SIGN CO 2501 NORWOOD CINCINNATI, OH 45212 COUNTY: HAMILTON	CERCLIS	0.459 Mi	NORTHWEST	375
39050000634	DEE SIGN CO 2501 NORWOOD AVE CINCINNATI, OH 45212-2725 COUNTY: HAMILTON	MSITES	0.459 Mi	NORTHWEST	634
39005000584	KLEIMAN AUTO BODY INC 2506 NORWOOD AVE NORWOOD, OH 45212-2726 COUNTY: HAMILTON	LUST	0.459 Mi	NORTHWEST	584
39005000507	SHELL 2564 WILLIAMS AVE CINCINNATI, OH 45212-4149 COUNTY: HAMILTON	LUST	0.474 Mi	SOUTHWEST	507
39050001068	EM IND INC EM SCIENCE DIV 2909 HIGHLAND AVE NORWOOD, OH 45212-2411 COUNTY: HAMILTON	MSITES	0.750 Mi	NORTHEAST	1068



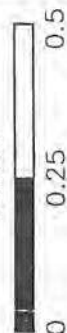
## SITE INFORMATION

Cincinnati, OH  
Hamilton County  
Job Number: 49603  
Map Plotted: May 31, 1994

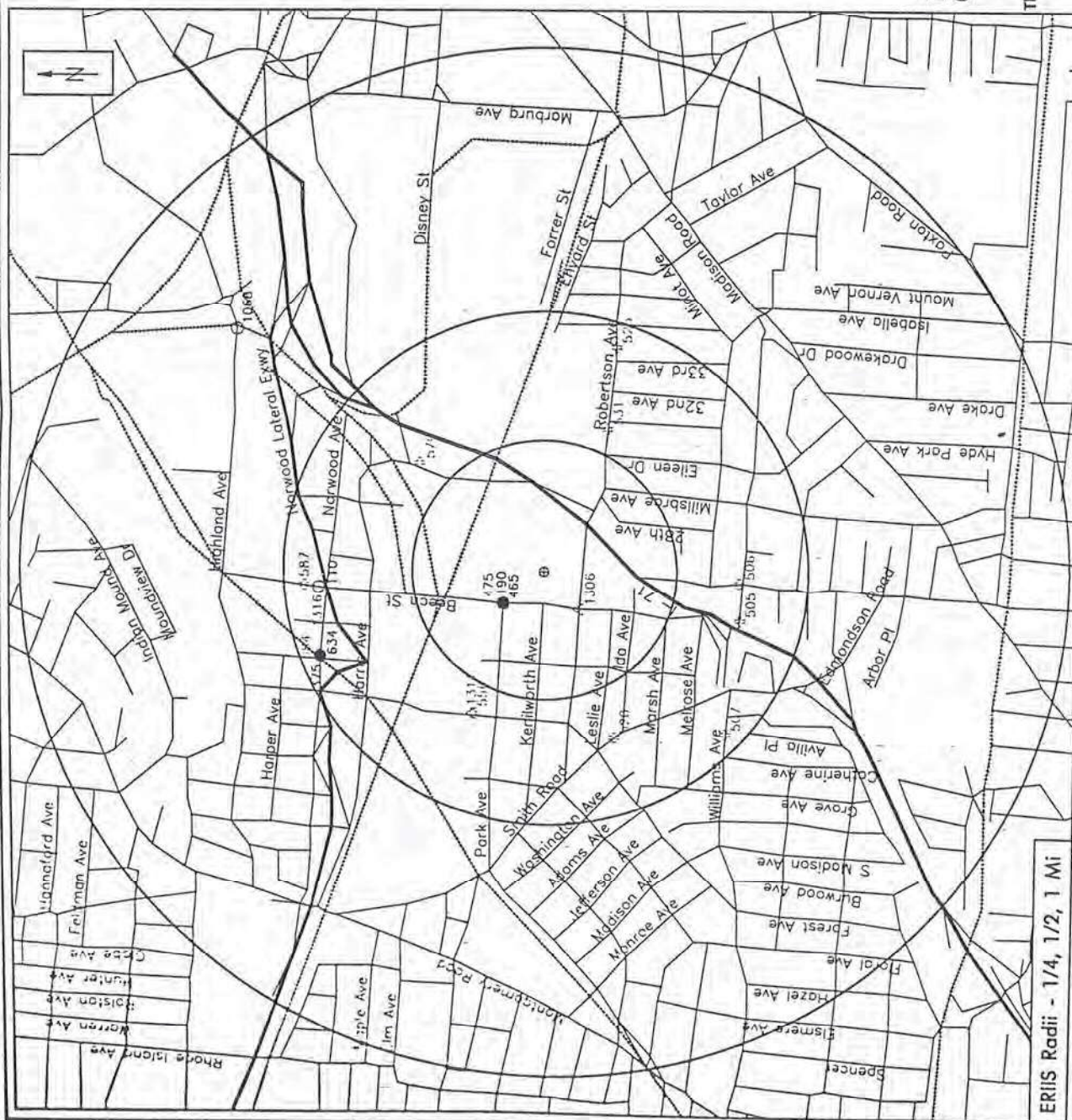
### MAP LEGEND

- | Hydrography | Railroads | Roads | Highways | NPL       | CERCLIS   | TRI       | RCRIS_TS  | RCRIS_LG  | RCRIS_SG  | ERNS      | UST       | LUST       | SWF       | MSITES    |
|-------------|-----------|-------|----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|-----------|-----------|
| —           | —         | —     | —        | ★         | ●         | △         | □         | □         | □         | ☆         | ◇         | ⊕          | △         | ○         |
|             |           |       |          | 0 Site(s) | 2 Site(s) | 3 Site(s) | 0 Site(s) | 0 Site(s) | 1 Site(s) | 0 Site(s) | 0 Site(s) | 10 Site(s) | 0 Site(s) | 4 Site(s) |

Miles



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ERIIS Radii -  $1/4, 1/2, 1 \text{ Mi}$

ERIS ENVIRONMENTAL DATA REPORT  
 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY INFORMATION SYSTEM  
 (CERCLIS - RADIUS SITES)

ERIS Report #49603

May 31, 1994

ERIS ID EPA ID	FACILITY	FACILITY ADDRESS	NPL STATUS INCIDENT CATEGORY	MAP ID
39001000190 OHD004234217	UNITED STATES PLAYING CARD CO DISTANCE FROM SITE: 0.098 MILES DIRECTION FROM SITE: NORTHWEST  SITE EVENT(S) DISCOVERY PRELIMINARY ASSESSMENT	PARK AVE & BEECH ST CINCINNATI, OH 45212 COUNTY: HAMILTON  COMPLETE DATE 08/01/80 09/25/85  ACTION PRIORITY BLANK NO FURTHER ACTION	NOT ON THE NPL BLANK	190
39001000375 OHD041593427	DEE SIGN CO DISTANCE FROM SITE: 0.459 MILES DIRECTION FROM SITE: NORTHWEST  SITE EVENT(S) DISCOVERY PRELIMINARY ASSESSMENT	2501 NORWOOD CINCINNATI, OH 45212 COUNTY: HAMILTON  COMPLETE DATE 06/01/81 09/01/84  ACTION PRIORITY BLANK NO FURTHER ACTION	NOT ON THE NPL BLANK	375

May 31, 1994

[illegible]

ERIIS ENVIRONMENTAL DATA REPORT  
 RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM  
 (RCRIS - SMALL QUANTITY GENERATORS - RADIUS SITES)

ERIIS Report #49603

May 31, 1994

ERIIS ID EPA ID	FACILITY ACTIVITIES RCRA COMPLIANT (Y/N)	ADDRESS	RAATS ISSUE DATE RAATS ACTION/STATUS RAATS PENALTIES	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
39008000475 OHD004234217	UNITED STATES PLAYING CARD CO SM QTY GEN Y	PARK AVE AND BEECH ST CINCINNATI, OH 45212 COUNTY: HAMILTON	FACILITY NOT REPORTED IN RAATS	0.098 MILES	NORTHWEST	475

REPORTED WASTE CODES  
 D000  
 F001  
 U226

ERIS ENVIRONMENTAL DATA REPORT  
OHIO LEAKING UNDERGROUND STORAGE TANKS  
(LUST - RADIUS SITES)

ERIS ID	FACILITY	ADDRESS	COUNTY	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
39005000531	FORMER ED & FRANK MOTORS	2795 ROBERTSON AVE CINCINNATI, OH 45209-1247 LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	HAMILTON	0.302 MILES	SOUTHEAST	531
39005000556	SIEMENS ENERGY & AUTOMATIO	4520 FOREST AVE NORWOOD, OH 45212-3306 LUST TRUST FUND (LTF) ELIGIBILITY SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM AN UST NOT REGULATED BY RCRA SUBTITLE I.	HAMILTON	0.311 MILES	NORTHWEST	556
39005000570	LUKA	3004 HARRIS AVE NORWOOD, OH 45212-2404 LUST TRUST FUND (LTF) ELIGIBILITY CLOSURE OF AN UNDERGROUND STORAGE TANK.	HAMILTON	0.313 MILES	NORTHEAST	570
39005000528	UNITED DAIRY FARMERS 075	4344 SMITH RD CINCINNATI, OH 45212-4237 LUST TRUST FUND (LTF) ELIGIBILITY PETROLEUM RELATED INCIDENT, BUT NOT FROM ANY SPILL, OVERFILL, OR RELEASE (I.E., IMPROPER VAPOR RECOVERY).	HAMILTON	0.354 MILES	SOUTHWEST	528
39005000506	BP 08942	4004 EDWARDS RD CINCINNATI, OH 45209-1612 LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	HAMILTON	0.376 MILES	SOUTHWEST	506
39005000505	SUPER AMERICA	2713 WILLIAMS AVE NORWOOD, OH 45209-1951 LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	HAMILTON	0.389 MILES	SOUTHWEST	505
39005000525	OAKLEY COMMERCE CENTER	2950 ROBERTSON AVE CINCINNATI, OH 45209-1202 LUST TRUST FUND (LTF) ELIGIBILITY CLOSURE OF AN UNDERGROUND STORAGE TANK.	HAMILTON	0.457 MILES	SOUTHEAST	525
39005000587	JH DAY CO	4932 BEECH ST CINCINNATI, OH 45212-2316 LUST TRUST FUND (LTF) ELIGIBILITY CLOSURE OF AN UNDERGROUND STORAGE TANK.	HAMILTON	0.457 MILES	NORTHWEST	587
39005000584	KLEIMAN AUTO BODY INC	2506 NORWOOD AVE NORWOOD, OH 45212-2726 LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	HAMILTON	0.459 MILES	NORTHWEST	584
39005000507	SHELL	2564 WILLIAMS AVE CINCINNATI, OH 45212-4149 LUST TRUST FUND (LTF) ELIGIBILITY CLOSURE OF AN UNDERGROUND STORAGE TANK.	HAMILTON	0.474 MILES	SOUTHWEST	507

# ERIS ENVIRONMENTAL DATA REPORT OHIO MASTER SITES LIST (MSITES - RADIUS SITES)

ERIS Report #49603

May 31, 1994

ERIS ID US EPA ID, OH EPA ID.	FACILITY	ADDRESS	PRELIMINARY ASSESSMENT DATE	PRIORITY	DELISTED(Y/N)	MAP ID
39050000465 OHD004234217 531-0846	UNITED STATES PLAYING CARD CO DISTANCE FROM SITE: 0.098 MILES DIRECTION FROM SITE: NORTHWEST	PARK AVE & BEECH ST CINCINNATI, OH 45212 COUNTY: HAMILTON	09/18/1985	LOW	NO	465
39050000110 NOT ASSIGNED 531-0968	SHEPHERD CHEMICAL CO DISTANCE FROM SITE: 0.431 MILES DIRECTION FROM SITE: NORTHWEST	4900 BEECH ST NORWOOD, OH 45212-2316 COUNTY: HAMILTON	/ /	NO PRIORITY	NO	110
39050000634 OHD041593427 531-0221	DEE SIGN CO DISTANCE FROM SITE: 0.459 MILES DIRECTION FROM SITE: NORTHWEST	2501 NORWOOD AVE CINCINNATI, OH 45212-2725 COUNTY: HAMILTON	08/10/1984	LOW	NO	634
39050001068 OHD086438538 531-0274	EM IND INC EM SCIENCE DIV DISTANCE FROM SITE: 0.750 MILES DIRECTION FROM SITE: NORTHEAST	2909 HIGHLAND AVE NORWOOD, OH 45212-2411 COUNTY: HAMILTON	05/07/1986	NO PRIORITY	NO	1068

## ERIIS GEOCODING

All sites on the Digital Custom Plotted Map and/or reported within the study radii are "point geocoded", i.e., each site is assigned a latitude/longitude value based on the actual location of the reported address. ERIIS point geocodes sites through a combination of address correction data processing, cross-database indexing, and proprietary geocoding software methods. The results are well worth the effort; point geocoding is simply the most accurate means of site location available today.

It is also the most demanding. Sites cannot be point geocoded if they do not have an accurate or complete street address. A facility listed at "Maple Avenue", for example, is not specific enough to point geocode. Similarly, although "451 Maple Avenue" appears to be both complete and accurate, the ERIIS geocoding system first scans Maple Avenue and finds that the valid address ranges are from 1500-6500. Because addresses such as these cannot be point geocoded, they can neither be plotted on the digital map nor reported by distance/direction from the study site.

Unfortunately, many of the addresses collected by Federal and State environmental agencies look like the examples above; they are incomplete and/or inaccurate. Does this mean that potentially relevant environmental threats are simply left out of the ERIIS Report? Certainly not.

### Secondary Search Sites

ERIIS has designed a proprietary secondary search logic that specifically scans those records that could not be point geocoded. This search is done using additional site-specific geographic information including ZIP code(s), city name(s), and county name(s). The results of the secondary search, listed on the following pages, provides an added measure of security found only in an ERIIS Report.

### Street Names Within The Study Radius

These secondary search sites require further review to accurately assess their proximity to the study site. To facilitate this review, ERIIS includes in each report an alphabetical list of streets that fall within the largest of the report radii. This convenient reference tool can be used to quickly and accurately cross-check the addresses of these secondary search sites.

### The ASTM Standard Practice For Environmental Site Assessments

As stated in the recently published **Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527)** by the American Society for Testing and Materials (ASTM):

"For large databases with numerous facility records (such as RCRA hazardous waste generators and registered underground storage tanks), the records are not *practically reviewable* unless they can be obtained from the source agency in the smaller geographic area of zip code. (3.3.24)"

If your environmental assessment does not require a secondary search broader than ZIP code (i.e., using city and county names), ERIIS will customize your data search at no additional charge.

ERIIS LIST OF STREETS IN THE RADIUS

ERIIS Report #49603

May 31, 1994

STREET NAME

28th Ave  
31st Ave  
32nd Ave  
33rd Ave  
34th Ave  
Adams Ave  
Alamo Ave  
Alberts Ct  
Allston St  
Andrew Pl  
Appleton Ave  
Arbor Pl  
Ash St  
Ashland Ave  
Atlantic Ave  
Avilla Pl  
Bach Ave  
Ballard Ave  
Beech St  
Bennett Ave  
Berwyn Pl  
Besuden Ct  
Brazee  
Briggs Pl  
Brotherton Road  
Browning Ave  
Brownway Ave  
Burch Ave  
Burwood Ave  
Buxton Ave  
Cadillac Ave  
Cameron Ave  
Cardiff Ave  
Carthage Ave  
Catherine Ave  
Cavour St  
Celeron Ave  
Columbus Ave  
Courtland Ave  
Cox Lane  
Crown Ave  
Cypress Way  
Dacey Ave  
Disney St  
Downing Dr  
Drake Ave  
Drakewood Dr  
Drex Ave  
Duck Creek Road  
Edmondson Road  
Edroy Ct  
Edwards Road  
Eileen Dr  
Elm Ave  
Elsmere Ave  
Enyard St  
Feldman Ave  
Fenwick Ave  
Ferdinand Pl  
Floral Ave  
Foraker Ave  
Forest Ave  
Forrer St  
Garland Ave  
W Gate Ave  
Gilmore Ave  
Grandview Ave  
Grove Ave  
Groveland Pl  
Harper Ave  
Harris Ave  
Hazel Ave  
Highland Ave  
Highland Av Ramp  
Hopkins Ave  
Hudson Ave  
Hyde Park Ave  
I-71 RAMP  
I-71  
Ibsen Ave  
Ibsen Av Ramp  
Ida Ave  
Indian Mound Ave  
Inverness Pl  
Irving Pl  
Isabella Ave  
Jefferson Ave  
S Jefferson Ave  
Judge Ave  
Kendall Ave  
Kenilworth Ave  
Laf Ter  
Lafayette Ave  
Langdon Ave  
Laura Lane  
Laurel Ave  
Lawn Ave  
Lawrence Ave  
Leslie Ave  
Lester Road  
Linden Ave

# ERIIS LIST OF STREETS IN THE RADIUS

ERIIS Report #49603

May 31, 1994

## STREET NAME

Lloyd Ave  
 Madison Ave  
 S Madison Ave  
 Malcolm Ave  
 Maple Ave  
 Maple Park Ave  
 Marburg Ave  
 Marion Ave  
 Markbreit Ave  
 Marlinton Ave  
 Marryat St  
 Marsh Ave  
 Malrose Ave  
 Michigan Ave  
 Middlebrook Ave  
 Mills Ave  
 Millsbrae Ave  
 Minot Ave  
 Minto Dr  
 Moeller Ave  
 Monroe Ave  
 Monteith Ave  
 Montgomery Road  
 Mooney Ave  
 Morton Ave  
 Mound Crest Dr  
 Moundview Dr  
 Mount Vernon Ave  
 Northwoods Lane  
 Norwd Lat Exwy Ramp  
 Norwood Ave  
 Norwood Lateral Exwy  
 O'Brien Pl  
 Oak St  
 Oak Park Pl  
 Orchard St  
 Park Ave  
 Parmalee Pl  
 Paxton Road  
 Pine St  
 Poplar St  
 Portsmouth Ave  
 Robertson Ave  
 Romana Pl  
 Roseland Mound  
 Rosella Ave  
 Ross Ave  
 Sagola Pl  
 Seal St  
 Shanmoor Ave  
 Shaw Ave  
 Sheridan Dr  
 Sherman Ave  
 Sherwood Lane  
 Sigsbee St  
 Silver St  
 Slane Ave  
 Smith Road  
 Station Ave  
 Stettinius Ave  
 Stewart Park  
 Sycamore Ave  
 Taylor Ave  
 Tracy Dr  
 Verne Ave  
 Wakefield Pl  
 Waltella Pl  
 Walter Ave  
 Wanda Ave  
 Washington Ave  
 Wasson Road  
 Wesley Ave  
 Weyer Ave  
 Willard Ave  
 Williams Ave  
 Woodland Ave  
 Zumstein Ave

ERIS ENVIRONMENTAL DATA REPORT  
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM  
(RCRIS - LARGE QUANTITY GENERATORS)

ERIS ID EPA ID	FACILITY ACTIVITIES RCRA COMPLIANT (Y/N)	ADDRESS	RAATS ISSUE DATE RAATS ACTION/STATUS RAATS PENALTIES
39007000798 OHD056487101	DINAGRAPHS INC. LG QTY GEN Y	BEECH AND ROBERTSON STS NORWOOD, OH 45212 COUNTY: HAMILTON	FACILITY NOT REPORTED IN RAATS

REPORTED WASTE CODES

D001  
F005  
U002  
U031  
U112  
U155  
U159  
U161  
U171  
U220  
U239

39007000126 ZUMBIEL C W CO  
OHD001845189 LG QTY GEN, TRANS  
Y

1743 CLENEY AVE  
CINCINNATI, OH 45212-3505  
COUNTY: HAMILTON

FACILITY NOT REPORTED IN RAATS

REPORTED WASTE CODES

F003  
F005  
U112  
U140  
U154

ERIIS ID EPA ID	FACILITY ACTIVITIES RCRA COMPLIANT (Y/N)	ADDRESS	RAATS ISSUE DATE		
			RAATS ACTION/STATUS	RAATS PENALTIES	FACILITY NOT REPORTED IN RAATS
39008006264 OHD986976686	CINCINNATI BELL TELEPHONE SM QTY GEN Y	HIGHLAND AVE NORWOOD, OH 45212			

REPORTED WASTE CODES  
D000  
F002

# ERIS ENVIRONMENTAL DATA REPORT OHIO UNDERGROUND STORAGE TANKS (UST)

ERIS Report #49603

May 31, 1994

ERIS ID FACILITY ID	FACILITY	ADDRESS COUNTY	OWNER ADDRESS	CONTACT CONTACT PHONE
------------------------	----------	-------------------	------------------	--------------------------

39010012147 DINAGRAPHS  
0-311058

BEECH & ROBERTSON STS  
NORWOOD, OH 45212  
HAMILTON

JEFFERSON SMURFIT CORP.

TANK ID  
39010013596 HICKS  
0-314157

SUBSTANCE  
WAYNE  
NORWOOD, OH 45212  
HAMILTON

AGE  
KENNETH B. ALBERS  
5532 FIRETHORN CT  
CINCINNATI, OH 45242

RALPH HICKS

TANK ID  
1  
2  
3

SUBSTANCE  
GASOLINE  
GASOLINE  
GASOLINE

AGE  
UNK  
UNK  
UNK

TANK MATERIAL  
UNKNOWN  
UNKNOWN  
UNKNOWN

39010017138 DINAGRAPHS  
0-310033

BEECH & ROBERTSON STS  
NORWOOD, OH 45212  
HAMILTON

JEFFERSON SMURFIT CORP.  
8182 MARYLAND AVE  
CLAYTON, MO 63105

TERRY SKIBA

TANK ID  
1  
2  
3  
4

SUBSTANCE  
METHYLETHYL KETONE  
HAZ-64-17-5  
HAZ-109-60-4  
HAZ-6474-89-8

AGE  
4  
4  
4  
4

TANK MATERIAL  
BARE STEEL  
BARE STEEL  
BARE STEEL  
BARE STEEL

ERIS ENVIRONMENTAL DATA REPORT  
OHIO LEAKING UNDERGROUND STORAGE TANKS  
(LUST)

ERIS Report #49603

May 31, 1994

ERIS ID	FACILITY	ADDRESS	COUNTY
39005012435	UNKNOWN	C/O EDWARDS & WASSON CINCINNATI, OH 45208	HAMILTON
INCIDENT NO. 319357-0-9000	STATUS SITE ASSESSMENT COMPLETED	LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	
39005012933	VACANT LOT (OLD SOHIO)	INT EDWARDS & OHIO OBSERVA CINCINNATI, OH 45208	HAMILTON
INCIDENT NO. 319163-0-9000	STATUS INITIAL CORRECTIVE ACTION	LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	
39005011044	SAYBROOK IMPORTS	3665 ERIE AVE CINCINNATI, OH 45208-1940	HAMILTON
INCIDENT NO. 3120830-0-FY92	STATUS INITIAL CORRECTIVE ACTIONS	LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	
39005010692	ARATEX SERVICES INC	2636 MONTGOMERY RD NORWOOD, OH 45212	HAMILTON
INCIDENT NO. 319069-0-9000	STATUS NO FURTHER ACTION	LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	
39005013302	CITY RIGHT OF WAY	RIDGE RD (ADJ VALUE CITY) CINCINNATI, OH 45213	HAMILTON
INCIDENT NO. 3112731-0-FY92	STATUS CONFIRMED	LUST TRUST FUND (LTF) ELIGIBILITY ELIGIBLE FOR LTF OVERSIGHT AND/OR SPENDING - SUSPECTED OR CONFIRMED FOR RELEASE OF PETROLEUM FROM A REGULATED UST.	

*Appendix E*

*CERCHIS Records*

## Preliminary Assessment Narrative

Date: September 18, 1985

Company: The United States Playing Card Co., Beech St &amp; Park Avenue, Norwood, OH 45212

D.F.: OHD004234217

The United States Playing Card Company is located at the intersection of Beech Street and Park Avenue, Norwood, Ohio, Hamilton County. The United States Playing Card Co. manufactures playing cards at a plant in an industrial area of Cincinnati. The site is bordered on the north by the Baltimore and Ohio Railroad, on the east by Highway 71, and on the south and west by residential areas. The site began its operations in 1950 and is still active.

The United States Playing Card Company submitted two forms which list wastes generated by the site. The first form, an EPA Notification of Hazardous Waste, lists DOWICIDE "C", Proxcoal, and PCB's as waste materials. DOWICIDE "C" (which is DOWICIDE "C" is a type of trichloroethylene) and Proxcoal are off-site landfills. The PCB's were shipped in two 55-gallon drums to Waste Management in Alabama. The second form, a RCRA Notification form which was later rescinded, listed spent halogenated solvents (FOOL), pentachlorophenol (PO90), and 1,1,1-trichloroethane (U226) as waste material.

Most of the site is paved and all run-off flows into storm sewers which eventually enters Metropolitan Sewer District. This minimizes any potential for groundwater and soil contamination. No spills have been reported.

Surface water contamination is a potential problem because of an alleged illegal outfall flowing into Duck Creek from the vicinity of U.S. Playing Card. Ohio EPA industrial wastewater is investigating this problem and trying to trace the origin of the outfall. On Sept 13, 1985 an off-site inspection was conducted by USEPA's Field Investigation Team (FIT) who observed that the site had restricted access by a fence surrounding the property. FIT noted that an odor similar to a "fresh deck of cards" was surrounding the site.

A low priority for State and FIT actions are recommended for this site. There is a limited potential for disposal of Hazardous Waste and groundwater contamination because most of the site is paved. Potential surface water contamination exists because of the alleged illegal outfall into Duck Creek, but Duck Creek is lined with cement and does not supply drinking water to the public.

lmr

RECEIVED

MAR 9 1986

Environmental  
SOUTHWEST OFFICE

EPA		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		I. IDENTIFICATION	
II. SITE NAME AND LOCATION		01 STATE		02 SITE NUMBER	
The United States Playing Card Co.		OH		04D00423417	
03 CITY		04 STATE		05 ZIP CODE	
Norwood		OH		45212	
09 COORDINATES		06 COUNTY		07 COUNTY CODE	
LATITUDE 39° 09' 32" N		Hamilton		061	
LONGITUDE 084° 26' 29" W		08 DIST		01	
10 DIRECTION TO SITE (Following from nearest public road) From Cincinnati: Follow Interstate 71 to Co. Hwy 501 (Smith Rd). Follow Hwy 501 (Smith Rd) west approx. 3/4 mile to Park Ave. Turn East/Right and Follow 0.5 mile to site. Facility is west of I-71 and south of B&O R.R.					
III. RESPONSIBLE PARTIES					
01 OWNER (if known)		02 STREET		03 TELEPHONE NUMBER	
The United States Playing Card Co.		Beech and Park Ave.		Wm. J. Martin Ext. 233	
04 CITY		05 ZIP CODE		06 TELEPHONE NUMBER	
Norwood		OH 45212		15131731-0220	
07 OPERATOR		08 STREET		09 TELEPHONE NUMBER	
The United States Playing Card Co.		Beech and Park Ave.		15131731-0220	
04 CITY		05 ZIP CODE		06 TELEPHONE NUMBER	
Norwood		OH 45212		15131731-0220	
13 TYPE OF OWNERSHIP (Check one)					
<input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check one)					
<input type="checkbox"/> A. FORA 3001 DATE RECEIVED: MONTH DAY YEAR <input checked="" type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 102) DATE RECEIVED: 6/5/81 MONTH DAY YEAR <input type="checkbox"/> C. NONE					
IV. CHARACTERIZATION OF POTENTIAL HAZARD					
01 ON SITE INSPECTION					
<input type="checkbox"/> YES DATE MONTH DAY YEAR <input checked="" type="checkbox"/> NO					
BY (Check one)					
<input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER					
CONTRACTOR NAME(S)					
02 SITE STATUS (Check one)					
<input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN					
03 YEARS OF OPERATION					
1950 Present UNKNOWN					
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED					
OCC. PCB (Toxic, Persistent) solvent, Pentachlorophenol (Toxic, Volatile, Flammable, soluble) <del>1,1,1-Trichloroethane (Toxic, Volatile, Flammable)</del>					
05 LIST OF POTENTIAL HAZARDS TO ENVIRONMENT AND/OR POPULATION					
Surface Water (Environment/Population) Soil (Environment)					
V. PRIORITY ASSESSMENT					
01 PRIORITY FOR INSPECTION (Check one)					
<input type="checkbox"/> A. HIGH <input checked="" type="checkbox"/> B. MEDIUM <input type="checkbox"/> C. LOW <input type="checkbox"/> D. NONE					
VI. INFORMATION AVAILABLE FROM					
01 CONTACT		02 OF (Agency/Person)		03 TELEPHONE NUMBER	
Scott Shane		NWDO / Dayton		15131449-6367	
04 PERSON RESPONSIBLE FOR ASSESSMENT		05 AGENCY		06 TELEPHONE NUMBER	
Anne C. Sause		FIT/USEPA		13121603-7415	
07 DATE		08 DATE		09 DATE	
9/18/85		9/18/85		9/18/85	

EPA FORM 3070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 2: WASTE INFORMATION

## IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	0HD004234217

## II. WAVE STATES, QUANTITIES, AND CHARACTERISTICS

<p>01 PHYSICAL STATES (Check all that apply)</p> <p>11 A SOLID 11 B POWDER, FIBES 11 C SLUDGE 11 D OTHER _____ (If other)</p>	<p>02 WASTE QUANTITY AT SITE (Estimate of waste quantities must be substantiated)</p> <p>TONS _____</p> <p>CUBIC YARDS _____</p> <p>NO. OF DRUMS <u>22</u></p>	<p>03 WASTE CHARACTERISTICS (Check all that apply)</p> <p><input checked="" type="checkbox"/> 1. TOXIC <input checked="" type="checkbox"/> 1. b CORROSIVE <input checked="" type="checkbox"/> 1. c RADIOACTIVE <input checked="" type="checkbox"/> 1. d PERMANENT</p> <p><input checked="" type="checkbox"/> 2 SOLUBLE <input checked="" type="checkbox"/> 3 INFECTIOUS <input checked="" type="checkbox"/> 4 FLAMMABLE <input checked="" type="checkbox"/> 5 IRRITABLE</p>	<p><input checked="" type="checkbox"/> 1. HIGHLY VOLATILE <input checked="" type="checkbox"/> 1. j EXPLOSIVE <input checked="" type="checkbox"/> 1. k REACTIVE <input checked="" type="checkbox"/> 1. l INCOMPATIBLE <input checked="" type="checkbox"/> 1. li NOT APPLICABLE</p>
-----------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

### III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	Q1 GROSS AMOUNT	Q2 UNIT OF MEASURE	Q3 COMMENTS
BLU	BLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS	Unknown	drums	p-catchlorophenol & 1,1,1-Trichloroethane. #
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	2	drums	PC-A14
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
DAS	BASES			

[illegible]

V. FEEDSTOCKS (See RESOURCES for GAS ALKYLATION)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

## VI. SOURCES OF INFORMATION (Cite specific agencies, e.g., State Dept, Defense Agency, etc.)

EPA Notification of Hazardous Waste Site; 103C information,  
RCRA Notification Form.





POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

OH 0400012347

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (Include name(s) of code-41)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Soil or material which is leaking or may leak)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

any spillage will run off into storm sewers and eventually flows into Metropolitan Sewer District.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

Ohio EPA has received complaints that the site has an illegal discharge to Duck Creek. This has not been caught.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: 3000

IV. COMMENTS

\* Based on the best estimate/population density of Cincinnati

V. SOURCES OF INFORMATION (Cite specific references, e.g., State files, records analysis, reports)

Off-site inspection by FRT 9-13-85  
file documents from Ohio EPA

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## PA DOCUMENTATION SHEET

SITE The United States Playing Card Co.  
IDENTIFICATION NUMBER. OH0004234217

SOURCE NUMBER	DESCRIPTION OF SOURCE
1A, 1B, 1C, 1D	<p>1A) QUAD NAME Cincinnati West, OH SIZE: 7.5 OF 15 YEAR 1961 (pre 1970)</p> <p>1B) QUAD NAME Cincinnati East, OH SIZE: 7.5 OF 15 YEAR 1961 (pre 1970)</p> <p>1C) QUAD NAME Newport, KY SIZE: 7.5 OF 15 YEAR 1983</p> <p>1D) QUAD NAME SIZE: 7.5 OF 15 YEAR</p>
	<p>Unlabeled. Site. Submitted by Wm. J. Martin, US Playing Card Co., 6-3-81.</p>
3	RCRA Part A Application submitted by Wm. J. Martin, US Playing Card Co., 11-8-80.
4	Federal Register, May 19, 1980; pages 33121 through 33121; List of Hazardous Waste numbers.
5	Conversation, 9-17-85; between Steve Nelson, FET and Valerie Brinker, Ohio EPA.
6	Off-site inspection narrative, conducted 9-13-89 by Pat Petrella, FET
	END

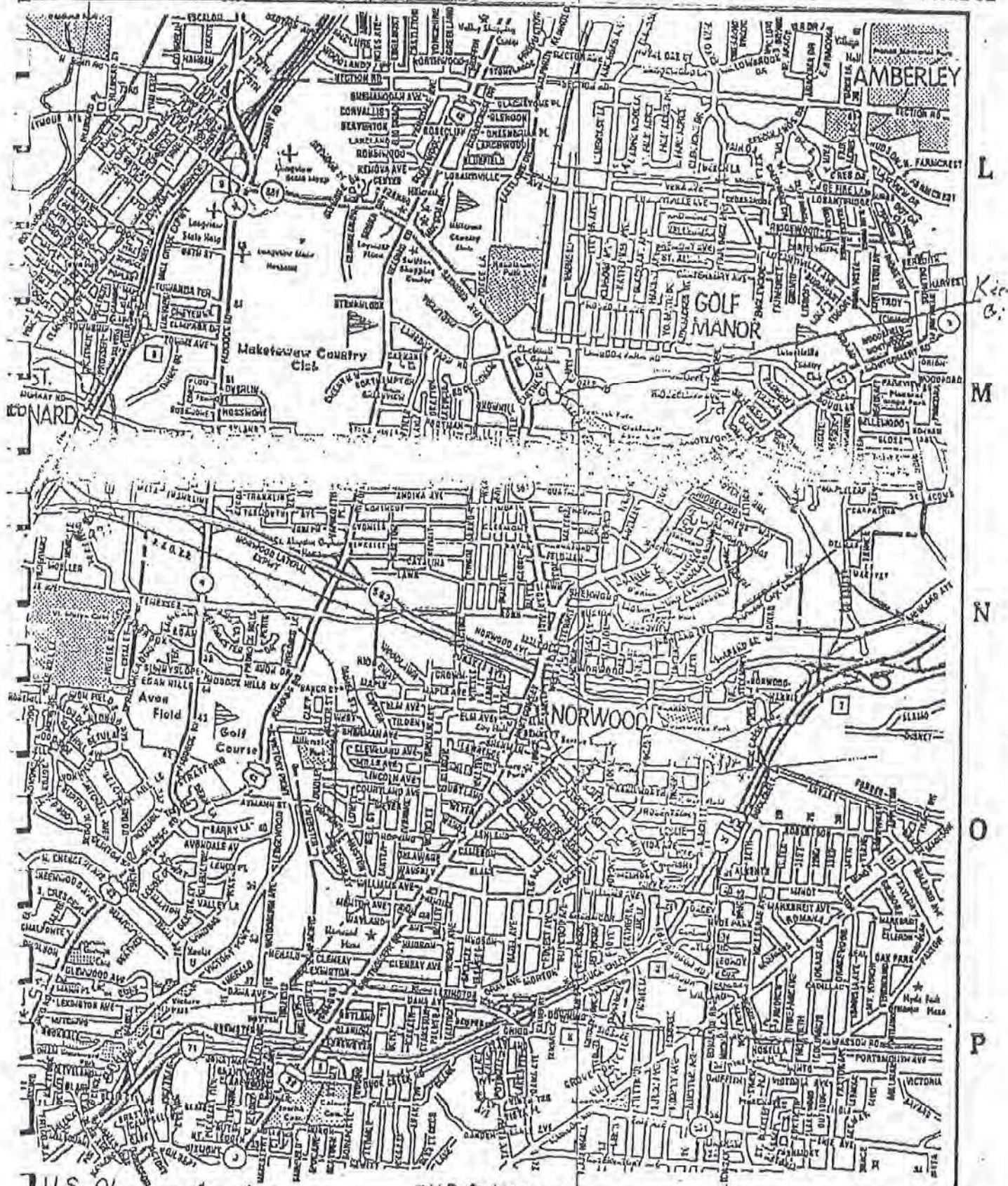
23

24

25

26

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U.S. Playing Card Co.  
Beech St. and Park Ave.  
Norwood, OH

OHD004234217

EPA		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT		1 IDENTIFICATION	
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS				01 STATE	02 SITE NUMBER
II. HAZARDOUS CONDITIONS AND INCIDENTS					
01 <input checked="" type="checkbox"/> A GROUNDWATER CONTAMINATION		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input checked="" type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 POPULATION POTENTIALLY AFFECTED: <u>(0)</u>		04 NARRATIVE DESCRIPTION			
A potential for groundwater contamination exists because the site handles liquid hazardous materials and little is known about site's waste handling practices.					
01 <input type="checkbox"/> B SURFACE WATER CONTAMINATION		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input checked="" type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 POPULATION POTENTIALLY AFFECTED: <u>0</u>		04 NARRATIVE DESCRIPTION			
Duck Creek flows past the site encased in a concrete storm sewer. A potential for the creek to be contaminated exists due to an alleged outfall from the site.					
01 <input type="checkbox"/> C CONTAMINATION OF AIR		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 POPULATION POTENTIALLY AFFECTED: _____		04 NARRATIVE DESCRIPTION			
Not Applicable.					
A small potential exists for a fire to occur because the site handles flammable materials.					
01 <input type="checkbox"/> D DIRECT CONTACT		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 POPULATION POTENTIALLY AFFECTED: _____		04 NARRATIVE DESCRIPTION			
Not Applicable; site is entirely fenced.					
01 <input type="checkbox"/> E CONTAMINATION OF SOIL		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input checked="" type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 AREA POTENTIALLY AFFECTED: <u>Unknown</u>		04 NARRATIVE DESCRIPTION			
A potential for soil contamination exists since the site handles hazardous materials, and no information is available concerning the site's waste handling practices.					
01 <input type="checkbox"/> F DRINKING WATER CONTAMINATION		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 POPULATION POTENTIALLY AFFECTED: _____		04 NARRATIVE DESCRIPTION			
Not Applicable; drinking water obtained from the Ohio River.					
01 <input type="checkbox"/> G WORKER EXPOSURE/HAZARD		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 WORKERS POTENTIALLY AFFECTED: _____		04 NARRATIVE DESCRIPTION			
None reported.					
01 <input type="checkbox"/> H POPULATION EXPOSURE/HAZARD		02 <input type="checkbox"/> OBSERVED (DATE: _____)		<input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED	
03 POPULATION POTENTIALLY AFFECTED: _____		04 NARRATIVE DESCRIPTION			
None reported.					

EPA FORM 350-13 (7-91)

EPA		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT		I. IDENTIFICATION	
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS		01 STATE	02 SITE NUMBER		
II. HAZARDOUS CONDITIONS AND INCIDENTS (continued)					
01 <input type="checkbox"/> J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
None Reported, or observed.					
01 <input type="checkbox"/> K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
None Reported, or Observed.					
01 <input type="checkbox"/> L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
Not Applicable.					
		<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
A potential for unincinerated hazardous materials and no information exists concerning their waste handling practices.					
01 <input type="checkbox"/> M. DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
None Reported.					
01 <input checked="" type="checkbox"/> N. CONTAMINATION OF SEWERS, STORM DRAINS, CULVERTS 04 NARRATIVE DESCRIPTION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
Duck Creek flows past site in a concrete storm sewer. Ohio E.P.A. will be checking out report of site having an illegal outfall to Duck Creek.					
01 <input checked="" type="checkbox"/> P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED		
Ohio E.P.A. has received a report that the site may have an illegal outfall to Duck Creek.					
06 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS					
III. TOTAL POPULATION POTENTIALLY AFFECTED: ~5000 / mile					
IV. COMMENTS					
*Based on best estimate / population density of Cincinnati.					
V. SOURCES OF INFORMATION (also include references to previous site visits, analyses, records)					
Off-site inspection by FIT, 9-13-85. File documents from Ohio E.P.A.					

United States  
Environmental Protection  
Agency.  
Washington DC 20400

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

0477-68

81 06 05

715-000-001-398

Name The United States Playing Card Company, TH

Street Beach and Park Avenue

City Cincinnati

State Ohio Zip Code 45212

Name of Seller: The United States Playing Card Company, The

Street Buwalda and Park Avenue

an Cincinnati

Cramer, H. - Miller Winn, Ohio Tr. Code 45212

Name (Last, First and Title) Martin; Wm. J., Operations Manager

Page 1251 95.

## From Year 1950

Y. (Y.) 1980

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☒ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☒ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

Doucide "C" was used - later Proxool was used as preservative - one pound was added to 200 Gallon storage tank on weekends which acted as preservative and anti-bacterial agent. November, 1980, we stopped using proxool in our coating.

Form Approved  
OIA No. 2400-013A  
CPA Form 5500-1  
WM:mag-6/3/81

000062 54-581

05 2007

Notification of Hazardous Waste Site		Side Two	
<b>F Waste Quantity:</b> Place an X in the appropriate boxes to indicate the facility types found at the site. In the "total facility waste amount" space give the estimated contained quantity (volume) of hazardous wastes at the site using cubic feet or gallons. In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.		<b>Facility Type</b> 1. <input type="checkbox"/> Piles 2. <input type="checkbox"/> Land Treatment 3. <input type="checkbox"/> Landfill 4. <input type="checkbox"/> Tanks 5. <input type="checkbox"/> Impoundment 6. <input type="checkbox"/> Underground Injection 7. <input checked="" type="checkbox"/> Drums, Above Ground 8. <input type="checkbox"/> Drums, Below Ground 9. <input type="checkbox"/> Other (Specify) _____	
		<b>Total Facility Waste Amount</b> cubic feet _____ Unknown gallons _____ <b>Total Facility Area</b> square feet _____ Unknown acres _____	
<b>G Known, Suspected or Likely Releases to the Environment:</b> Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.			
<input type="checkbox"/> Known <input type="checkbox"/> Suspected <input type="checkbox"/> Likely <input checked="" type="checkbox"/> None			
Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.			
<b>H Sketch Map of Site Location: (Optional)</b> Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction from the site to the nearest town or city.		<b>OLD GUATING IN 55 GALLON DRUMS:</b> 1. Center Hill Land Fill near Procter & Gamble Facility on Center Hill Road, Cincinnati, Ohio. 2. Walton, Kentucky 3. Waste Management, Emolia, Alabama	
<b>I Description of Site: (Optional)</b> Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.		1. Center Hill - closed. 2. Walton, Kentucky - Unknown. 3. Waste Management - E.P.A. approved.	
<b>J Signature and Title:</b> The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in Item A). For other persons providing notification, this signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".			
Name <u>John J. Martin</u> Street _____ City _____ State _____ Zip Code _____ Signature <u>John J. Martin</u> Date <u>6/3/81</u> Title <u>J. Martin</u> WJCM:mas		<input checked="" type="checkbox"/> Owner, Present <input type="checkbox"/> Owner, Past <input type="checkbox"/> Transporter <input type="checkbox"/> Operator, Present <input type="checkbox"/> Operator, Past <input type="checkbox"/> Other	

# PHASE I ENVIRONMENTAL SITE ASSESSMENT

*4590 Beech Street  
Norwood, Ohio*

**December 2013**

**Prepared for:**

Industrial Realty Group, LLC

**Prepared by:**

Cody Ehlers Group  
935 White Plains Road  
Trumbull, CT 06611

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FIGURE 1 SITE LOCATION MAP

FIGURE 2 SITE PLAN

## APPENDICES

APPENDIX A	EDR DATABASE REPORT
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APPENDIX C	FIELD REPORT AND PHOTO LOG
APPENDIX D	INVESTIGATION AND REMEDIATION REPORTS
APPENDIX E	1994 PHASE I REPORT

## 1.0 INTRODUCTION

At the request of the United States Playing Card Company (USPC), Cody Ehlers Group (CEG) conducted a Phase I Environmental Site Assessment (ESA) of the property located at 4590 Beech Street in Norwood, Ohio ("the Property"). Norwood is part of the greater Cincinnati area, in Hamilton County. The Property is currently owned by USPC.

The project has been completed in accordance with good commercial and customary practice for the purpose of identifying environmental conditions of potential concern to a prospective owner or lender. The scope of work conducted for this assessment was performed in accordance with the ASTM Standard E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* and the U. S. Environmental Protection Agency's All Appropriate Inquiry Standard, 40 CFR Part 312. The specific scope of work performed during CEG's assessment program included the following tasks.

### On-Site Inspection

An on-site inspection of the Property was conducted to identify the presence of physical conditions or operations of environmental concern including the use, treatment, storage, disposal or generation of hazardous substances or petroleum products. On-site inspection activities addressed visual evidence of environmental contamination, on-site wastewater discharges, solid waste disposal, the presence of non-native fill materials, aboveground and underground storage vessels, ground water monitoring and supply wells, PCB containing equipment and other conditions that could represent potential for liability to an owner or lender. Robert Ehlers of CEG conducted the site inspection on December 5, 2013. Ms. Ehlers was accompanied by Dr. Wayne Dorband, environmental representative for Industrial Realty Group, and Mr. Rick Montgomery, former Facility Manager for USPC.

### Historical Use Review

A review of available information relating to historical use of the Property was conducted to determine if past uses might have resulted in adverse environmental impact. Review activities included:

- Interviews with long term employees of the USPC at the Property regarding historical operations and materials management practices.
- Information provided by review of aerial photographs dated 1938, 1951, 1956, 1975, 1977, 1987 and 1990.
- Information provided by review of Sanborn Fire Insurance Maps from 1917, 1950 and 1981.

### Regulatory Review

CEG reviewed a detailed regulatory database search report prepared specifically for this project by FirstSearch Technology Corporation (FirstSearch) to determine whether the Property or surrounding properties appear on federal, state or county lists of sites of environmental concern.

CEG also reviewed documents regarding closure of underground storage tanks (USTs), sampling of environmental media and environmental remediation activities performed at the Property.

The scope of work for this assessment specifically did not address lead-based paint, lead in drinking water, urea formaldehyde foam insulation or radon.

### Previous Environmental Reports

CEG reviewed the following documents:

Due Diligence Audit  
The United States Playing Card Company  
Beach and Park  
Cincinnati, OH 45212  
ERM, Inc. July 8, 1994

Field Report and Photo Log  
U.S. Playing Card – Facility Review  
Norwood, OH  
April 26, 2004

## **2.0    *PROPERTY DESCRIPTION AND HISTORICAL USES***

### **2.1    *Property Description***

The Property is located at 4590 Beech Street in the Norwood area of Cincinnati, Ohio. The area is a densely developed mixture of industrial, commercial and residential land uses. The Property occupies approximately 20.4 acres, and currently consists of three free standing structures, a fire water reservoir and a large paved parking area.

The largest structure includes seven interconnected multi-story buildings (Buildings 1 through 7) that were historically used primarily for manufacturing, storage and distribution of playing cards. This structure occupies the western portion of the Property, running almost the entire north/south length of the Property along Beech Street. Partial basements and utility tunnels are present beneath portions of some of these buildings. A natural gas fired boiler room is located at the east end of Building 1.

Building 10 is a one story brick building located behind Building 1 (east) near the north end of the Property. It was moved to its current location from its original location to the west, along Beech Street. Building 10 was originally used as a cafeteria for the complex. It is currently used by a tenant as a carpenter shop. A bermed concrete containment pad is located outside of the east end of building 10. This pad has a shed roof with corrugated plastic roof panels. Several of the roof panels were missing at the time of CEG's on-site inspection. Standing water was present inside the containment area. No evidence of petroleum sheen or indication of contamination was observed.

A concrete block building designed for storage of flammable liquids is adjacent to the concrete containment pad east of Building 10. A subsurface concrete dry well is located just outside the western wall of the structure. It is thought that this structure may serve as an emergency containment system in the event that flammable liquids were spilled inside the block building. No evidence of any historical releases to this system was identified.

Building 9 is the Power House. Two large coal fired boilers located in this building had been used until approximately 1986 to generate steam for the facility.

The Property has been connected to the municipal sewer system since its construction in the early 1900s. No evidence of historical on-site septic systems or wastewater impoundments was identified.

Four on-site water supply wells have historically been used at the Property. Well # 1 was reportedly approximately 240 feet deep, was installed in 1902 and closed in 1991. Wells #3 and #4 were also closed in 1991. Well # 2 remained active after 1991. The on-site water supply wells were used for a variety of uses, including potable water supply, for many years. .

## ***2.2 Present and Historical Uses***

The Property was reported to have been used as farmland prior to initiation of construction of the existing buildings in approximately 1900. Since that time, certain buildings were added, modified, moved and demolished.

Production of playing cards has been performed at the Property since its initial construction. Associated operations have included laminating, gluing, undercoating, printing, coating and cutting.

### ***2.3.1 Physical Setting***

According to the U.S.G.S. Burlington, Kentucky Quadrangle Topographic Map (1991), the Property is located on a hilltop with an elevation of approximately 900 feet above mean sea level (msl). Stormwater on the Property flows away from the building and into catch basins located around the site. Since the Property is located on a hilltop, it is likely that groundwater below the site would flow radially away from the Property in all directions.

The Ohio River is located about 1.5 miles north and there are several unnamed streams located about ¼ mile south of the Property.

According to the NRCS web-based soil survey (Boone, Campbell and Kenton Counties, KY, 2006 & 2007), the Property is underlain by Jessup Silt Loam (12-20% slope), Rossmoyne silt loam (0-12% slope). According to this soil survey, groundwater beneath the site may range from an elevation of approximately 19" to more than 80" below grade, and bedrock is likely to be at an elevation of approximately 40" below grade.

Based FEMA's Flood Insurance Rate Map depicting the Property (21015C0120C100, 6/4/2007), the Property is in a Zone X flood zone (areas with less than 0.2% chance of flood annually; areas of 1% chance of flood with average depths of less than 1 foot with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance of flood).

### 3.0 REGULATORY REVIEW

CEG utilized the services of Environmental Data Resources, Inc. (EDR) to prepare a report of relevant federal, state and local environmental databases. The presence of a site in the EDR review does not necessarily mean that the site constitutes an environmental threat. The EDR Radius Map Report with Geotrack is included as Appendix A.

United States Playing Card Company is listed on several state and federal databases, as summarized below. None of these listings indicate the presence of existing conditions of environmental concern.

- Integrated Compliance Information System (ICIS) database: US Playing Card is listed on the AIRs database as having had regulated air emissions. Notices of Violations (NOVs) were issued in 1986.
- Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) – No Further Remedial Action Proposed (NFRAP): The US Playing Card property was first listed on the CERCLIS database in 1980. It was then assessed and archived in 1985.
- Resource Conservation and Recovery Act (RCRA) Small Quantity Generator (SQG): Halogenated Solvents were formerly generated by US Playing Card. An informal violation was issued in 2005 and resolved in 2009.
- Facility Index System (FINDS): US Playing Card is included in the FINDS database because of its listings on the AIRs and RCRA Databases.
- Ohio Division of Emergency & Remedial Response's Database (OH DERR) conducted a site assessment at the Property. No additional information was provided.
- The Manifest Database includes reference of off-site disposal of PCB-wastes from the Property. No additional information was provided.

Additionally, Fox Midwest Trucking is listed on the Ohio Spills Database as having had a release on the Property. This release occurred on April 25, 1995 and involved diesel fuel. This spill case is closed.

Active leaking underground storage tank sites (LUSTs) are located on the following parcels within 0.25 mile of the Property.

- The United Dairy Farmers gasoline station located 0.35 miles southwest from the Property. The release involved gasoline and occurred on October 22, 2012.
- The Former Ed & Frank Motors facility, located approximately 0.39 mile east-southeast of the property. This release was reported on July 19, 1990.

Based on the information provided in the EDR Report regarding these LUST sites and other facilities in the surrounding area, no evidence of significant adverse

environmental impacts to the Property attributable to surrounding properties was identified.

## **4.0 ON-SITE INSPECTION**

CEG conducted an on-site inspection of the Property to identify the presence of conditions of potential environmental concern. This inspection addressed the presence of underground and aboveground storage tanks, visual signs of surficial contamination, storage, discharge or dumping of materials of concern, distressed vegetation and any other evidence of conditions of potential environmental concern.

### **4.1 Air Emissions**

The USPCC facility is not currently operating as a manufacturing facility and does not operate permitted air emissions units. Natural gas-fired boilers installed in 2003 are used to heat the buildings.

Historical regulated air emissions sources included the former coal fired boilers, sheet fed, web press and miscellaneous other printing presses and the use of clean-up solvents.

Roof mounted dust collection devices are located above Building 5. These devices formerly collected paper dust that was generated during playing card manufacturing. Mr. Montgomery reported that these units have been emptied.

### **4.2 Chemical Use and Storage**

Production of playing cards was performed at the Property from its initial construction through cessation of operations in January 2010. Manufacturing operations included laminating, gluing, undercoating, printing, coating and cutting.

Chemicals used in the manufacturing process included inks, glues, alcohols, printing press fountain solutions and blanket wash, starches and various cleaning solvents (mineral spirits, turpentine, 1,1,1-trichloroethane (TCA) and trichloroethylene (TCE)). Kerosene and various lubricating and hydraulic oils were also used in manufacturing and maintenance equipment.

A parts cleaning shed was formerly located in front of Building 10. Parts cleaning activities performed at this location included the spraying of solvents onto the materials to be cleaned. In October 1994, soil borings were installed to investigate environmental conditions in this area. Visual impacts to soil were observed to be limited to approximately the upper two feet. TCE was detected in soil at a concentration of 34.9 mg/kg.

Additional investigation of this area was performed to delineate the aerial extent of contamination. As a result of this additional investigation, approximately 15 tons of soil were removed and properly disposed of.

Documentation associated with the investigation and remediation of the former parts cleaning shed area is provided in Appendix D.

No visual evidence of significant adverse environmental impacts associated with historical chemical use and management was observed during CEG's on-site inspection activities.

#### **4.3     *Solid and Hazardous Waste Storage and Disposal***

USPCC formerly operated as a small quantity generator (SQG) of hazardous waste with USEPA hazardous waste generator identification number OHD004234217. At times, USPCC's rate of hazardous waste generation was low enough to classify it as a conditionally exempt small quantity generator (CESQG). Hazardous wastes historically generated at the Property consisted primarily of spent solvents. A waste drum storage area was formerly located at the rear of Building 10, on the north side of the building.

The former 30 ft X 60 ft waste drum storage area was investigated during the October 1994 sampling event. Five soil borings were installed throughout this area. Coal fragments were present in approximately the upper 6 inches of each sample. Soil samples that included materials from both the coal layer and underlying soil were collected for laboratory analysis for VOCs. No VOCs were present at concentrations that exceeded the laboratory detection limits. Documentation associated with these investigative activities is provided in Appendix D.

Non-hazardous wastes and recyclable materials that were generated at the USPCC facility included ink wastes, coating wastes, used oils, paper waste, scrap metal, empty drums, wooden pallets and general office and packaging trash.

No evidence of significant adverse environmental impacts associated with historical on-site waste management or disposal was identified.

#### **4.4     *Water Supply and Wastewater Discharges***

The Property has been connected to the municipal sewer system since its construction in the early 1900s. No evidence of historical on-site septic systems was identified.

A three stage settling chamber had been located in the north drive to remove paste materials (starch and paper black) prior to discharge to the municipal sewer system. After cessation of operations, this chamber was cleaned out and backfilled in accordance with the Metropolitan Sewer District of Greater Cincinnati closure requirements.

Four on-site water supply wells were historically used at the Property. Well # 1 was reportedly approximately 240 feet deep, was installed in 1902 and closed in 1991. Wells #3 and #4 were also closed in 1991. Well # 2 remained active after 1991. The on-site water supply wells were used for a variety of uses, including potable water supply, for many years. In June 1991, a sample of the drinking water from the USPC facility was analyzed for VOCs and submitted to Ohio EPA, Division of Public Drinking Water. No VOCs were present at concentrations exceeding the laboratory detection limits.

#### **4.5    *Polychlorinated Biphenyl (PCB) Management***

In 1980, a sampling program was conducted to determine the PCB content of transformer oils at the Property. At that time, transformer #2 at the power house was determined to contain PCB oils. Transformer #3 at the power house contained 47 ppm PCB. The other transformers that were sampled were determined to be non-PCB units. Two transformers were subsequently removed for off-site disposal.

In October 1994, soil sampling was performed around the power house transformer pad, including the former location of the above referenced PCB transformers. A sample of oily residue on the transformer pad was also collected. PCBs were present in the soil samples at concentrations up to 2,090 mg/kg. The oily residue contained 103,000 mg/kg. PCB contaminated soil and debris was excavated and on January 24, 1995 transported for appropriate disposal at CWM Chemical Services in Model City, NY. Documentation associated with the transformers and the investigation/remediation of PCB materials is provided in Appendix D.

The power house transformer currently labeled as #2 is labeled as a non-PCB unit. No remaining evidence of leakage or staining is present at the power house transformer pad.

In addition to the power house, oil filled transformer equipment is also present near the parking lot entrance northeast of Building 10 and at the southeast corner of Building 7. Discolored soil is present around the equipment at Building 7, although no evidence of recent leakage was observed. This equipment is reported to be owned by the utility company. This ownership status should be confirmed and responsibility for the discolored soil determined.

Older fluorescent lighting fixtures, electrical equipment and hydraulic equipment could potentially contain PCB materials. No evidence of any environmental impacts associated with such materials was identified. However, this type of equipment should be properly managed in the event of disposal.

#### **4.6     *Storage Tanks and Other Containers***

An elevated above ground diesel fuel storage tank is located in the lower level of the power house. This tank, required to power the back-up fire water pump in the event of an emergency, is equipped with secondary containment. No evidence of any releases from the tank was observed.

Four underground storage tanks (USTs) were formerly present at the Property. Three of these USTs, located in the courtyard south of Building 1, were used to store kerosene, mineral spirits and turpentine. They were removed by MVM Maintenance Contractors in 1988. MVM's report indicates that the USTs were 1,000 gallons, 500 gallons and 300 gallons in volume, but doesn't specify which sized UST contained which product. Although MVM's written report indicated that no evidence of leakage was identified, no samples were collected from during removal.

The former kerosene, turpentine and mineral spirits UST graves were investigated during the 1994 soil boring program. Three soil borings were advanced to depths ranging from 6 feet to 12 feet. Continuous soil samples were collected from the borings and screened in the field visually and with an HNU meter. No evidence of contamination was identified. One sample from each boring was sent for laboratory analysis for VOCs. NO VOCs were present above the laboratory detection limits.

Soil samples were collected during removal of an alcohol UST located on the north side of Building #1. Three samples were analyzed by Cardinal Laboratory for isopropyl alcohol. Isopropyl alcohol was not present in any of the samples at concentrations above the laboratory detection limits.

Documentation associated with UST removal and soil investigation activities is provided in appendices D and E.

Two above ground enamel mixing tanks are present in secondary containment the courtyard south of Building 1. These tanks are reported to be empty. No evidence of any adverse environmental impacts associated with these tanks was identified.

#### **4.7     *Asbestos Containing Materials (ACM)***

The Property was constructed in sections beginning in approximately 1900. Based on this date of construction, ACM was present in many of the building materials, heating equipment and pipe insulation. USPPC has identified and developed a program to remove and/or manage ACM. However, ACM is still present at various locations throughout the Property. Any renovation or demolition work should be preceded by review of existing ACM-related documentation and supplemented by ACM survey work, as appropriate.

#### **4.8    *Environmental Liens***

No environmental liens on the Property were identified through CEG's Phase I activities.

#### **4.9    *Purchase Price***

CEG does not have any information regarding sales price or the current value of the Property.

## 5.0 PRINCIPAL FINDINGS & CONCLUSIONS

CEG performed a Phase I Environmental Assessment of the United States Playing Card Company property located at 4590 Beech Street in Norwood, Ohio. This assessment was performed in accordance with the ASTM Standard E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* and the U. S. Environmental Protection Agency's All Appropriate Inquiry Standard, 40 CFR Part 312.

ASTM Standard E 1527-05 defines Recognized Environmental Condition (REC) as *"the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release or a material threat of a release of any hazardous substance or petroleum products into structures on the property or into the ground, groundwater or surface water of the property."*

Based on the definition of RECs provided in the ASTM standard, no current RECs have been identified on the Property.

However, discolored soils were observed at the location of the transformer equipment at the southeast corner of Building 7. It is thought that this equipment is owned by the electrical utility company. This ownership status should be confirmed and responsibility for the discolored soil determined.

Potential ACM should be evaluated for the presence of asbestos prior to any demolition or disposal.

## **6.0 QUALIFICATIONS AND CERTIFICATION**

### **6.1 Qualifications**

Robert Ehlers has over twenty years of professional experience providing site assessment, investigation and remediation services for commercial and industrial sites.

### **6.2 Certification**

I declare that, to the extent of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Subpart 312.10. I have the specific qualifications and based on education training and experience to assess a property of the nature, history and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Signed by:



---

**Robert Ehlers**

## 7.0 LIMITATIONS

The findings and conclusions set forth in this report are based upon information that was available to CEG during its inspection of the property. If new information becomes available concerning the property after this date, or if the property is used in the future in a manner other than that which is identified in this report, the findings and conclusions contained herein may have to be modified.

Additionally, while this investigation was performed in accordance with good commercial and customary practice and generally accepted protocols within the consulting industry, CEG cannot guarantee that the property is completely free of hazardous substances or other materials or conditions that could subject a tenant or purchaser to potential liability. The presence or absence of any such condition can only be confirmed through investigation activities beyond the scope of this assessment.

The report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the facts currently available within the limits of the existing data, scope of work, budget and schedule. *To the extent that more definitive conclusions are desired by the client than are warranted by the currently available facts, it is specifically CEG's intent that the conclusions stated herein will be intended as guidance and not necessarily a firm course of action except where explicitly stated as such.* CEG makes no warranties, expressed or implied, including, without limitation, warranties as to merchantability or fitness for a particular purpose. In addition, the information provided to (the client) in this report is not to be construed as legal advice.

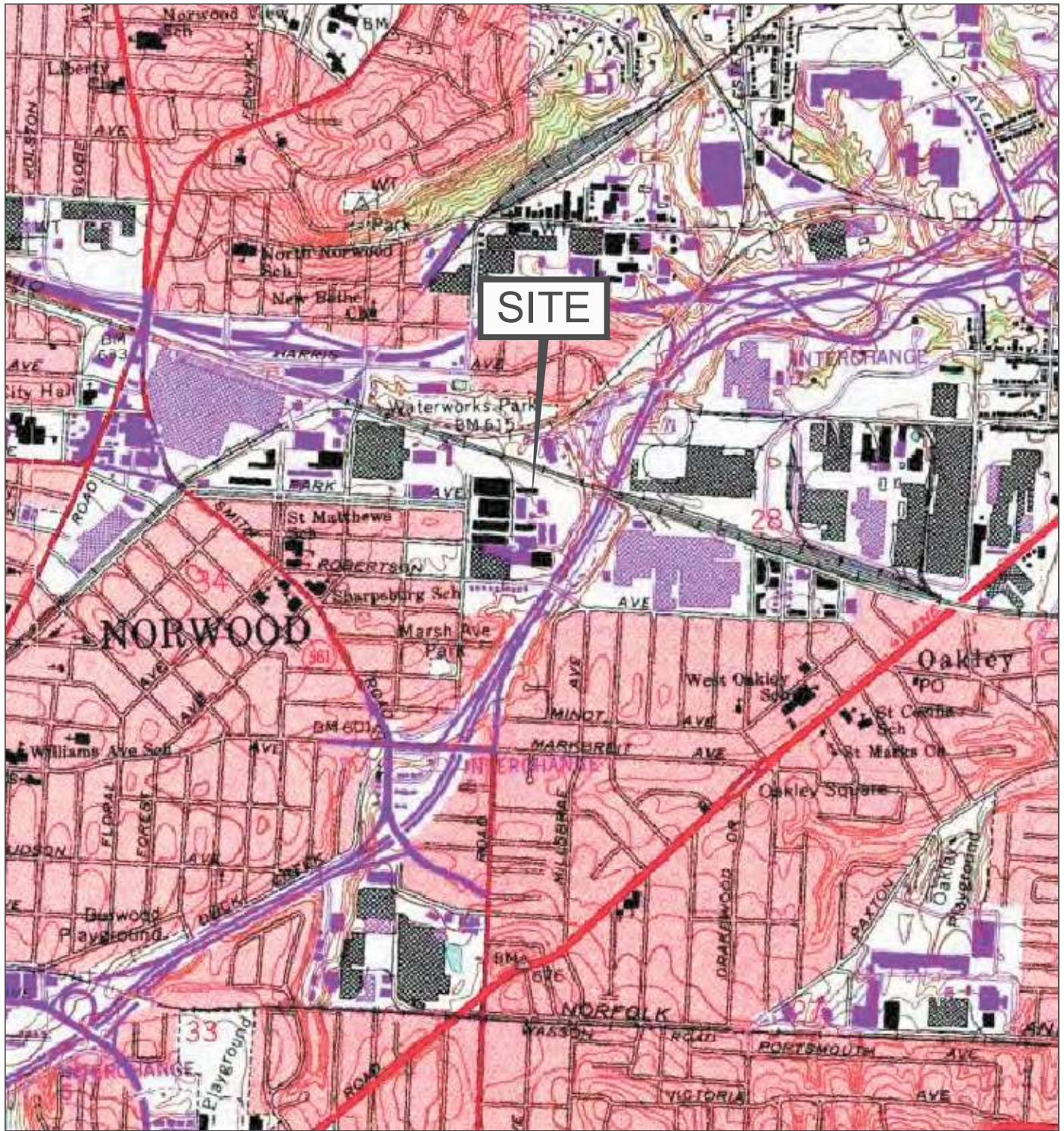
While ASTM Standard E-1527 states that the standard practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner defense to liability under the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) Section 101 (35) (B), CEG does not represent that this Phase I work, in and of itself, constitutes "all appropriate inquiry into the previous ownership and uses of the property."

CEG is not engaged in environmental auditing and reporting for the purpose of advertising, sales promotion, or endorsement of any client's interests, including raising investment capital, recommending investment decisions, or other publicity purposes. Client acknowledges this report has been prepared for the exclusive use of client and agrees that CEG reports or correspondence will not be used or reproduced in full or in part for such purposes, and may not be used or relied upon in any prospectus or offering circular. Client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this audit and report will mention or imply the name of CEG.

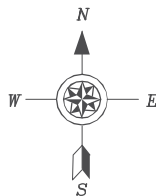
Nothing contained in this report shall be construed as a warranty or affirmation by CEG that the site and property described in the report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will not expose the lender to potential environmental liability.

CEG declares that, "to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312" and CEG has the specific qualifications based on education, training and experience to assess a property of the nature, history, and setting of the subject property. CEG has developed and performed the all appropriate inquiries in conformance with the standards and practices set fort in 40 CFR Part 112.

## FIGURES



QUADRANGLE  
LOCATION



0 600 1500 3000  
Scale in Feet

SOURCE: TOPO! USGS CINCINNATI EAST, OH QUADRANGLE, 1988  
LAT 39.1586, LONG. -84.4415 ELEVATION = 627'

## CODY EHLERS GROUP

EHS CONSULTING AND SERVICES

140 SHERMAN STREET, FAIRFIELD, CONNECTICUT 06424

TITLE:

SITE LOCATION MAP

DATE:

6/8/11

SCALE:

AS SHOWN

FIGURE

1

PREPARED FOR:

4590 BEECH STREET  
CINCINNATI, OHIO 45212

DRAWING NO:

322-013A

APPR. BY:

R.E.

BEECH STREET

BUILDING 1

BUILDING 3

BLDG.  
2

BUILDING 5

BUILDING 4

BUILDING 6A

BUILDING 6

BUILDING 7

## APPENDICES

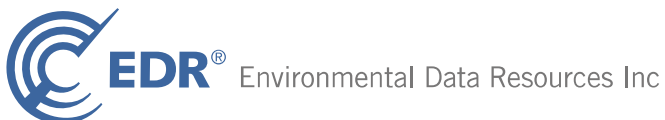
**APPENDIX A**  
**EDR DATABASE REPORT**

**4590 Beech Street**

4590 Beech Street  
Norwood, OH 45212

Inquiry Number: 3803389.1s  
December 05, 2013

## The EDR Radius Map™ Report with GeoCheck®



440 Wheelers Farms Road  
Milford, CT 06461  
Toll Free: 800.352.0050  
[www.edrnet.com](http://www.edrnet.com)

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***Thank you for your business.***  
Please contact EDR at 1-800-352-0050  
with any questions or comments.

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## EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

### TARGET PROPERTY INFORMATION

#### ADDRESS

4590 BEECH STREET  
NORWOOD, OH 45212

#### COORDINATES

Latitude (North): 39.1589000 - 39° 9' 32.04"  
Longitude (West): 84.4429000 - 84° 26' 34.44"  
Universal Transverse Mercator: Zone 16  
UTM X (Meters): 720948.4  
UTM Y (Meters): 4337316.5  
Elevation: 622 ft. above sea level

### USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 39084-B4 CINCINNATI EAST, OH  
Most Recent Revision: 1981

### AERIAL PHOTOGRAPHY IN THIS REPORT

Photo Year: 2011  
Source: USDA

### TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 8 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
UNITED STATES PLAYING CARD CO 4590 BEECH STREET CINCINNATI OH 452123449 CINCINNATI, OH 45212	ICIS	N/A
UNITED STATES PLAYING CARD CO PARK AVE AND BEECH ST CINCINNATI, OH 45212	CERC-NFRAP RCRA-SQG FINDS OH DERR Activity: SA NY MANIFEST	OHD004234217
FOX MIDWEST TRUCKING 4590 BEECH RD CINCINNATI, OH	OH SPILLS	N/A

## EXECUTIVE SUMMARY

### DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

### STANDARD ENVIRONMENTAL RECORDS

#### ***Federal NPL site list***

NPL..... National Priority List  
Proposed NPL..... Proposed National Priority List Sites  
NPL LIENS..... Federal Superfund Liens

#### ***Federal Delisted NPL site list***

Delisted NPL..... National Priority List Deletions

#### ***Federal CERCLIS list***

CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System  
FEDERAL FACILITY..... Federal Facility Site Information listing

#### ***Federal RCRA generators list***

RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

#### ***Federal institutional controls / engineering controls registries***

US ENG CONTROLS..... Engineering Controls Sites List  
LUCIS..... Land Use Control Information System

#### ***Federal ERNS list***

ERNS..... Emergency Response Notification System

#### ***State- and tribal - equivalent CERCLIS***

OH SHWS..... This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal NPL list.

#### ***State and tribal landfill and/or solid waste disposal site lists***

OH SWF/LF..... Licensed Solid Waste Facilities

#### ***State and tribal leaking storage tank lists***

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

#### ***State and tribal registered storage tank lists***

INDIAN UST..... Underground Storage Tanks on Indian Land

## EXECUTIVE SUMMARY

FEMA UST..... Underground Storage Tank Listing

### ***State and tribal institutional control / engineering control registries***

OH HIST ENG CONTROLS... Operation & Maintenance Agreements Database

### ***State and tribal voluntary cleanup sites***

INDIAN VCP..... Voluntary Cleanup Priority Listing

## **ADDITIONAL ENVIRONMENTAL RECORDS**

### ***Local Brownfield lists***

US BROWNFIELDS..... A Listing of Brownfields Sites

### ***Local Lists of Landfill / Solid Waste Disposal Sites***

ODI..... Open Dump Inventory  
DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations  
OH HIST LF..... Old Solid Waste Landfill  
INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands

### ***Local Lists of Hazardous waste / Contaminated Sites***

US CDL..... Clandestine Drug Labs  
OH CDL..... Clandestine Drug Lab Locations  
US HIST CDL..... National Clandestine Laboratory Register

### ***Local Land Records***

LIENS 2..... CERCLA Lien Information

### ***Records of Emergency Release Reports***

HMIRS..... Hazardous Materials Information Reporting System  
OH SPILLS 90..... SPILLS 90 data from FirstSearch  
OH SPILLS 80..... SPILLS 80 data from FirstSearch

### ***Other Ascertainable Records***

DOT OPS..... Incident and Accident Data  
DOD..... Department of Defense Sites  
FUDS..... Formerly Used Defense Sites  
CONSENT..... Superfund (CERCLA) Consent Decrees  
ROD..... Records Of Decision  
UMTRA..... Uranium Mill Tailings Sites  
US MINES..... Mines Master Index File  
TSCA..... Toxic Substances Control Act  
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)  
HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing  
SSTS..... Section 7 Tracking Systems  
PADS..... PCB Activity Database System

## EXECUTIVE SUMMARY

MLTS.....	Material Licensing Tracking System
RADINFO.....	Radiation Information Database
RAATS.....	RCRA Administrative Action Tracking System
RMP.....	Risk Management Plans
OH TOWNGAS.....	DERR Towngas Database
OH DRYCLEANERS.....	Drycleaner Facility Listing
OH AIRS.....	Title V Permits Listing
OH USD.....	Urban Setting Designation Sites
OH HIST USD.....	Urban Setting Designations Database
INDIAN RESERV.....	Indian Reservations
SCRD DRYCLEANERS.....	State Coalition for Remediation of Drycleaners Listing
OH CRO.....	Cessation of Regulated Operations Facility Listing
OH COAL ASH.....	Coal Ash Disposal Site Listing
OH Financial Assurance.....	Financial Assurance Information Listing
US FIN ASSUR.....	Financial Assurance Information
EPA WATCH LIST.....	EPA WATCH LIST
PRP.....	Potentially Responsible Parties
PCB TRANSFORMER.....	PCB Transformer Registration Database
COAL ASH DOE.....	Steam-Electric Plant Operation Data
COAL ASH EPA.....	Coal Combustion Residues Surface Impoundments List
LEAD SMELTERS.....	Lead Smelter Sites

### EDR HIGH RISK HISTORICAL RECORDS

#### ***EDR Exclusive Records***

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
EDR US Hist Auto Stat.....	EDR Exclusive Historic Gas Stations
EDR US Hist Cleaners.....	EDR Exclusive Historic Dry Cleaners

### SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property. Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

### STANDARD ENVIRONMENTAL RECORDS

#### ***Federal CERCLIS NFRAP site List***

CERC-NFRAP: Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a

## EXECUTIVE SUMMARY

recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

A review of the CERC-NFRAP list, as provided by EDR, and dated 04/26/2013 has revealed that there is 1 CERC-NFRAP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>DEE SIGN CO</i>	<i>2501 NORWOOD</i>	<i>NNW 1/4 - 1/2 (0.380 mi.)</i>	<i>D13</i>	<i>67</i>

### ***Federal RCRA CORRACTS facilities list***

CORRACTS: CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

A review of the CORRACTS list, as provided by EDR, and dated 07/11/2013 has revealed that there are 2 CORRACTS sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>GMC ASSEMBLY DIV. - NORWOOD PL</i>	<i>4726 SMITH ROAD</i>	<i>WNW 1/2 - 1 (0.645 mi.)</i>	<i>F24</i>	<i>83</i>
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>EM IND INC EM SCIENCE DIV</i>	<i>2909 HIGHLAND AVENUE</i>	<i>NE 1/2 - 1 (0.655 mi.)</i>	<i>25</i>	<i>88</i>

### ***Federal RCRA generators list***

RCRA-LQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

A review of the RCRA-LQG list, as provided by EDR, and dated 07/11/2013 has revealed that there are 2 RCRA-LQG sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>SIEMENS ENERGY &amp; AUTOMATION, I</i>	<i>4620 FOREST AVENUE</i>	<i>WNW 1/8 - 1/4 (0.237 mi.)</i>	<i>B5</i>	<i>42</i>
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>DI-NA-CAL LABEL GROUP NORWOOD</i>	<i>4500 BEECH STREET</i>	<i>S 0 - 1/8 (0.066 mi.)</i>	<i>4</i>	<i>16</i>

## EXECUTIVE SUMMARY

### State- and tribal - equivalent CERCLIS

OH DERR: The DERR database is an index of sites for which Ohio EPA maintains files. It includes sites with known or suspected contamination, but a site's inclusion in the database does not mean that it is now or has ever been contaminated.

A review of the OH DERR list, as provided by EDR, and dated 08/14/2013 has revealed that there are 7 OH DERR sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Direction / Distance	Map ID	Page
<b>DEE SIGN CO</b> Activity: SA	<b>2501 NORWOOD</b>	<b>NNW 1/4 - 1/2 (0.380 mi.)</b>	<b>D13</b>	<b>67</b>
<b>GMC ASSEMBLY DIV NORWOOD PLT</b> Activity: SA	<b>4726 SMITH RD</b>	<b>WNW 1/2 - 1 (0.643 mi.)</b>	<b>F23</b>	<b>82</b>
<b>SURREY SQUARE MALL, CINCINNATI</b> Activity: VAP	<b>4524 MONTGOMERY RD</b>	<b>W 1/2 - 1 (0.742 mi.)</b>	<b>26</b>	<b>142</b>
<b>ROOKWOOD COMMONS, NORWOOD</b> Activity: VAP	<b>2620 THRU 2750 EDMONDSO</b>	<b>SSW 1/2 - 1 (0.790 mi.)</b>	<b>27</b>	<b>143</b>
Lower Elevation	Address	Direction / Distance	Map ID	Page
<b>SHEPHERD CHEMICAL CO, NORWOOD</b>	<b>4900 BEECH ST</b>	<b>N 1/4 - 1/2 (0.365 mi.)</b>	<b>11</b>	<b>66</b>
<b>EM IND INC EM SCIENCE DIV</b> Activity: RR	<b>2909 HIGHLAND AVENUE</b>	<b>NE 1/2 - 1 (0.655 mi.)</b>	<b>25</b>	<b>88</b>
<b>CINCINNATI MILACRON</b> Activity: COF, VAP	<b>4701 MARBURG AVE</b>	<b>E 1/2 - 1 (0.981 mi.)</b>	<b>28</b>	<b>146</b>

### State and tribal leaking storage tank lists

OH LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Commerce Division of State Fire Marshal's List of Reported Petroleum Underground Storage Tank Release Incidents.

A review of the OH LUST list, as provided by EDR, and dated 08/18/2013 has revealed that there are 12 OH LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Direction / Distance	Map ID	Page
<b>KNOWLTON MFG.</b> FR Status: Active FR Status: T2E: Tier 2 Evaluation Facility Status: Active FR Status: T2E: Tier 2 Evaluation	<b>2524 LESLIE AVE</b>	<b>SW 1/4 - 1/2 (0.309 mi.)</b>	<b>7</b>	<b>58</b>
<b>UNITED DAIRY FARMERS #075</b> FR Status: Active FR Status: T1I: Tier 1 Investigation Facility Status: Active FR Status: T1I: Tier 1 Investigation	<b>4344 SMITH RD</b>	<b>SW 1/4 - 1/2 (0.348 mi.)</b>	<b>10</b>	<b>64</b>
<b>KLEIMAN AUTO BODY INC</b> FR Status: Active FR Status: SUS: a suspected release or source is identified Facility Status: Active FR Status: SUS: a suspected release or source is identified	<b>2506 NORWOOD AVE</b>	<b>NNW 1/4 - 1/2 (0.377 mi.)</b>	<b>D12</b>	<b>66</b>
<b>SALVATION ARMY</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>2250 PARK AVE</b>	<b>W 1/4 - 1/2 (0.447 mi.)</b>	<b>18</b>	<b>72</b>
<b>SPEEDWAY #9582</b> FR Status: Inactive FR Status: NFA: No Further Action FR Status: Inactive FR Status: DIS: a release is disproved Facility Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: DIS: a release is disproved	<b>2713 WILLIAMS AVE</b>	<b>S 1/4 - 1/2 (0.457 mi.)</b>	<b>19</b>	<b>73</b>

## EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>BP OIL CO. #08942</b> FR Status: Inactive FR Status: DIS: a release is disproved FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: DIS: a release is disproved Facility Status: Inactive FR Status: NFA: No Further Action	<b>4004 EDWARDS RD</b>	<b>S 1/4 - 1/2 (0.460 mi.)</b>	<b>20</b>	<b>77</b>
<b>Lower Elevation</b>	<b>Address</b>	<b>Direction / Distance</b>	<b>Map ID</b>	<b>Page</b>
<b>PUBLIC WORKS BUILDING</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>3001 HARRIS AVE</b>	<b>NE 1/4 - 1/2 (0.330 mi.)</b>	<b>C8</b>	<b>60</b>
<b>FEDERAL EXPRESS CORPORATION</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>3004 HARRIS AVE</b>	<b>NE 1/4 - 1/2 (0.331 mi.)</b>	<b>C9</b>	<b>62</b>
<b>THE C.W. ZUMBIEL CO</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>2339 HARRIS AVE</b>	<b>NW 1/4 - 1/2 (0.390 mi.)</b>	<b>14</b>	<b>69</b>
<b>FORMER ED &amp; FRANK MOTORS</b> FR Status: Active FR Status: RPT: a possible incident is reported Facility Status: Active FR Status: RPT: a possible incident is reported	<b>2795 ROBERTSON RD</b>	<b>ESE 1/4 - 1/2 (0.392 mi.)</b>	<b>E15</b>	<b>70</b>
<b>J.H. DAY COMPANY</b> FR Status: Active FR Status: NCR: No closure report received letter sent Facility Status: Active FR Status: NCR: No closure report received letter sent	<b>4932 BEECH ST</b>	<b>N 1/4 - 1/2 (0.396 mi.)</b>	<b>16</b>	<b>71</b>
<b>SHELL OIL CO. #23461780241</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>2564 WILLIAMS RD</b>	<b>SSW 1/4 - 1/2 (0.488 mi.)</b>	<b>21</b>	<b>79</b>

OH UNREG LTANKS: A suspected or confirmed release of petroleum from a non-regulated UST.

A review of the OH UNREG LTANKS list, as provided by EDR, and dated 08/25/1999 has revealed that there are 2 OH UNREG LTANKS sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>SIEMENS INDUSTRY</b> Facility Status: CON	<b>4620 FOREST AVE</b>	<b>WNW 1/8 - 1/4 (0.237 mi.)</b>	<b>B6</b>	<b>57</b>
<b>Lower Elevation</b>	<b>Address</b>	<b>Direction / Distance</b>	<b>Map ID</b>	<b>Page</b>
<b>OAKLEY COMMERCE CENTER</b> Facility Status: RPT	<b>2950 ROBERTSON RD</b>	<b>ESE 1/4 - 1/2 (0.405 mi.)</b>	<b>E17</b>	<b>72</b>

### State and tribal registered storage tank lists

OH UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Commerce Division of State Fire Marshal's Facility File.

A review of the OH UST list, as provided by EDR, and dated 08/18/2013 has revealed that there is 1 OH

## EXECUTIVE SUMMARY

UST site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>DI-NA-CAL LABEL GROUP NORWOOD</i>	<i>4500 BEECH STREET</i>	<i>S 0 - 1/8 (0.066 mi.)</i>	<i>4</i>	<i>16</i>

### ADDITIONAL ENVIRONMENTAL RECORDS

#### ***Local Lists of Landfill / Solid Waste Disposal Sites***

OH SWRCY: A listing of recycling facility locations.

A review of the OH SWRCY list, as provided by EDR, and dated 01/14/2013 has revealed that there is 1 OH SWRCY site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
KING RECYCLING	5038 BEECH STREET	N 1/4 - 1/2 (0.499 mi.)	22	82

#### ***Local Lists of Registered Storage Tanks***

OH ARCHIVE UST: Underground storage tank records that have been removed from the Underground Storage Tank database.

A review of the OH ARCHIVE UST list, as provided by EDR, and dated 08/18/2013 has revealed that there is 1 OH ARCHIVE UST site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>DI-NA-CAL LABEL GROUP NORWOOD</i>	<i>4500 BEECH STREET</i>	<i>S 0 - 1/8 (0.066 mi.)</i>	<i>4</i>	<i>16</i>

## EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped. Count: 1 records.

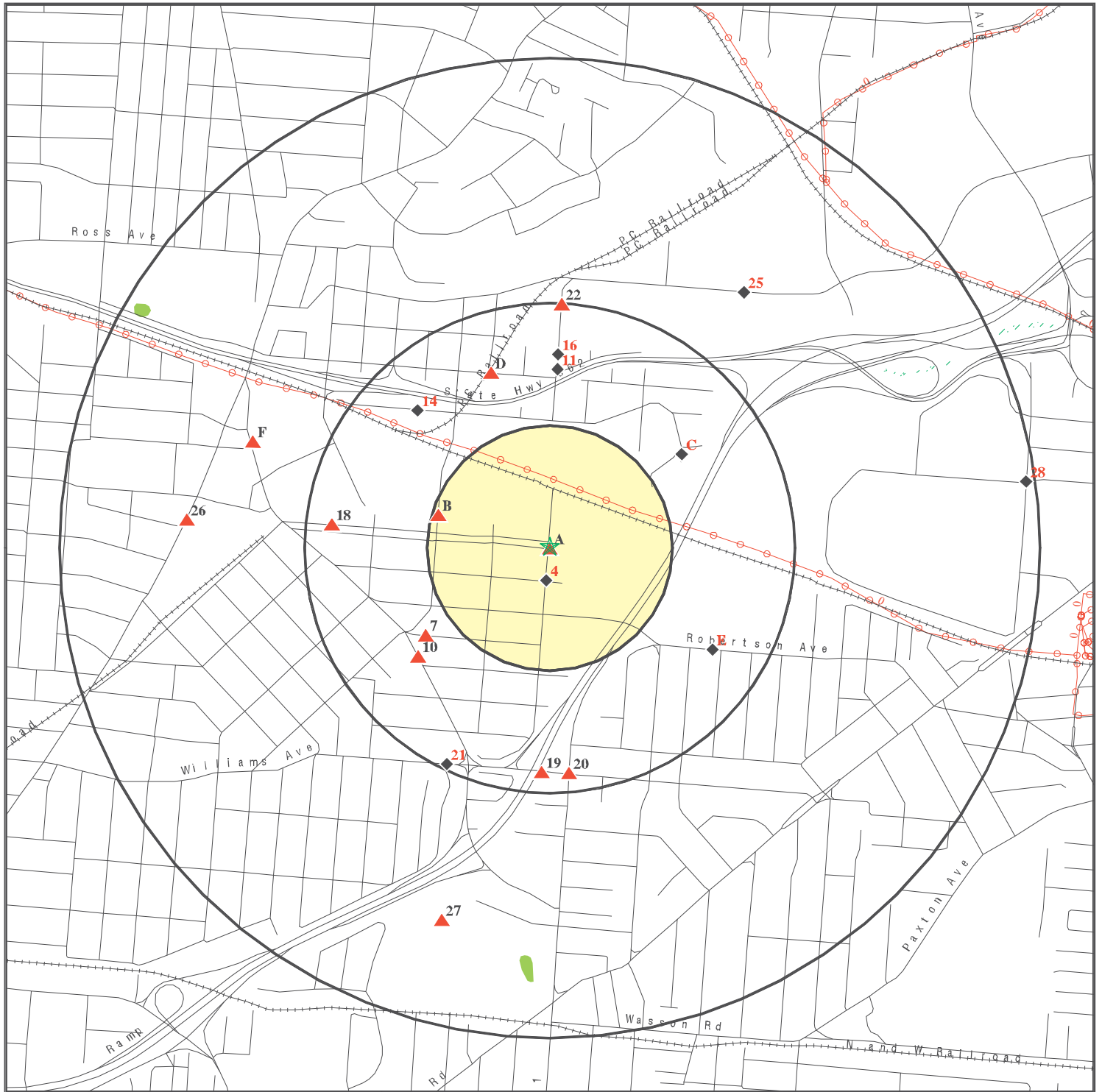
Site Name

UNKNOWN

Database(s)

OH LUST

# OVERVIEW MAP - 3803389.1s



★ Target Property

▲ Sites at elevations higher than or equal to the target property

◆ Sites at elevations lower than the target property

⚙ Manufactured Gas Plants

☒ National Priority List Sites

☒ Dept. Defense Sites

Indian Reservations BIA

Power transmission lines

Oil & Gas pipelines from USGS

100-year flood zone

500-year flood zone

National Wetland Inventory

State Wetlands

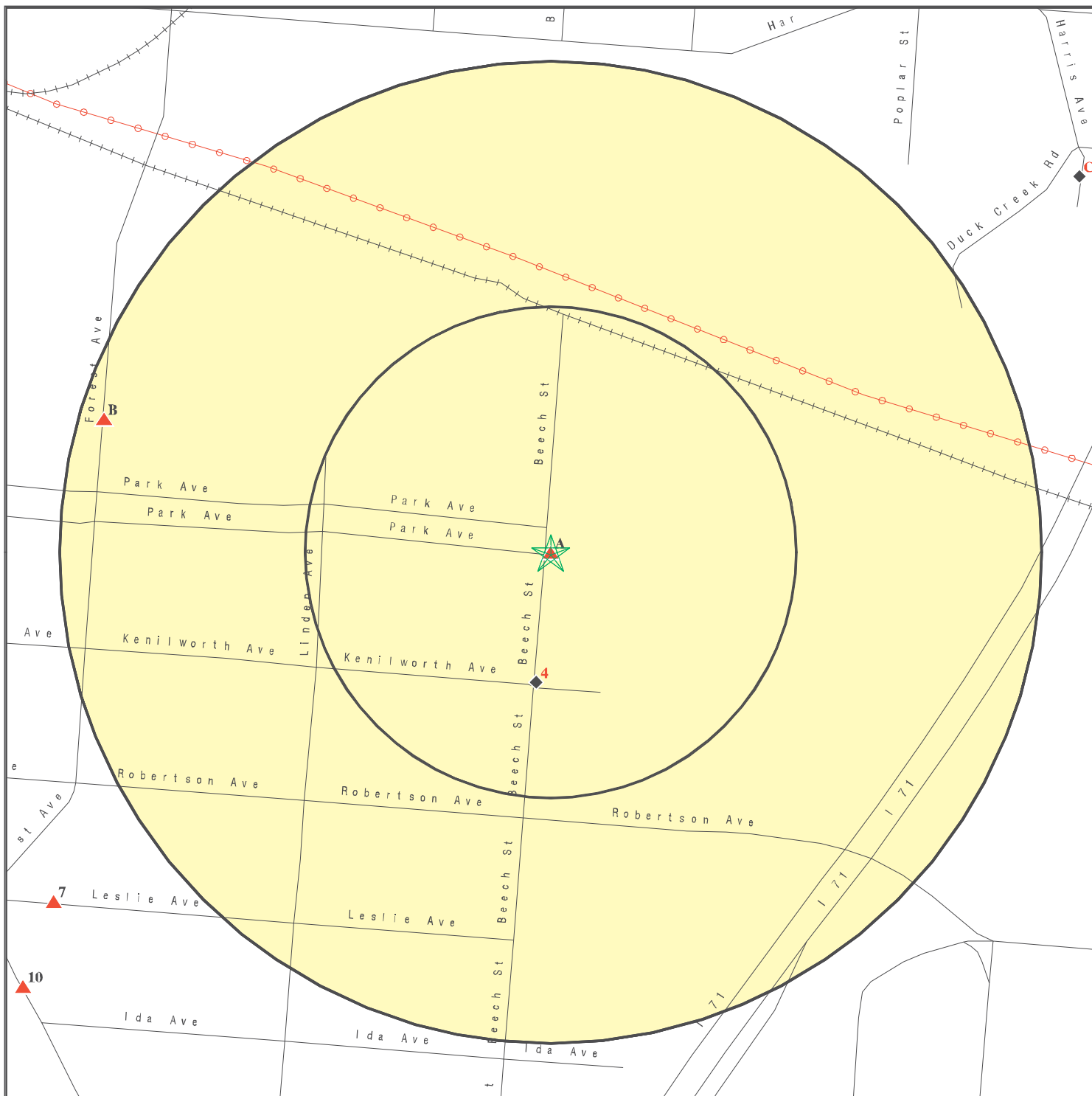
0 1/4 1/2 1 Miles

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: 4590 Beech Street  
ADDRESS: 4590 Beech Street  
Norwood OH 45212  
LAT/LONG: 39.1589 / 84.4429

CLIENT: Cody Ehlers Group  
CONTACT: Mary Glista  
INQUIRY #: 3803389.1s  
DATE: December 05, 2013 2:30 pm

# DETAIL MAP - 3803389.1s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ⚙ Manufactured Gas Plants
- ⚠ Sensitive Receptors
- 🏠 National Priority List Sites
- 🏢 Dept. Defense Sites

- 🏠 Indian Reservations BIA
- ⚡ Power transmission lines
- 🛢 Oil & Gas pipelines from USGS
- 🌊 100-year flood zone
- 🌊 500-year flood zone

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: 4590 Beech Street  
 ADDRESS: 4590 Beech Street  
 Norwood OH 45212  
 LAT/LONG: 39.1589 / 84.4429

CLIENT: Cody Ehlers Group  
 CONTACT: Mary Glista  
 INQUIRY #: 3803389.1s  
 DATE: December 05, 2013 2:31 pm

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b>STANDARD ENVIRONMENTAL RECORDS</b>								
<b><i>Federal NPL site list</i></b>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	TP		NR	NR	NR	NR	NR	0
<b><i>Federal Delisted NPL site list</i></b>								
Delisted NPL	1.000		0	0	0	0	NR	0
<b><i>Federal CERCLIS list</i></b>								
CERCLIS	0.500		0	0	0	NR	NR	0
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
<b><i>Federal CERCLIS NFRAP site List</i></b>								
CERC-NFRAP	0.500	1	0	0	1	NR	NR	2
<b><i>Federal RCRA CORRACTS facilities list</i></b>								
CORRACTS	1.000		0	0	0	2	NR	2
<b><i>Federal RCRA non-CORRACTS TSD facilities list</i></b>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA generators list</i></b>								
RCRA-LQG	0.250		1	1	NR	NR	NR	2
RCRA-SQG	0.250	1	0	0	NR	NR	NR	1
RCRA-CESQG	0.250		0	0	NR	NR	NR	0
<b><i>Federal institutional controls / engineering controls registries</i></b>								
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
LUCIS	0.500		0	0	0	NR	NR	0
<b><i>Federal ERNS list</i></b>								
ERNS	TP		NR	NR	NR	NR	NR	0
<b><i>State- and tribal - equivalent CERCLIS</i></b>								
OH SHWS	N/A		N/A	N/A	N/A	N/A	N/A	N/A
OH DERR	1.000	1	0	0	2	5	NR	8
<b><i>State and tribal landfill and/or solid waste disposal site lists</i></b>								
OH SWF/LF	0.500		0	0	0	NR	NR	0
<b><i>State and tribal leaking storage tank lists</i></b>								
OH LUST	0.500		0	0	12	NR	NR	12
OH UNREG LTANKS	0.500		0	1	1	NR	NR	2
INDIAN LUST	0.500		0	0	0	NR	NR	0

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b>State and tribal registered storage tank lists</b>								
OH UST	0.250		1	0	NR	NR	NR	1
INDIAN UST	0.250		0	0	NR	NR	NR	0
FEMA UST	0.250		0	0	NR	NR	NR	0
<b>State and tribal institutional control / engineering control registries</b>								
OH ENG CONTROLS	0.500		0	0	0	NR	NR	0
OH INST CONTROL	0.500		0	0	0	NR	NR	0
OH HIST INST CONTROLS	0.500		0	0	0	NR	NR	0
OH HIST ENG CONTROLS	0.500		0	0	0	NR	NR	0
<b>State and tribal voluntary cleanup sites</b>								
OH VCP	0.500		0	0	0	NR	NR	0
INDIAN VCP	0.500		0	0	0	NR	NR	0
<b>State and tribal Brownfields sites</b>								
OH BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b>ADDITIONAL ENVIRONMENTAL RECORDS</b>								
<b>Local Brownfield lists</b>								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b>Local Lists of Landfill / Solid Waste Disposal Sites</b>								
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
OH SWRCY	0.500		0	0	1	NR	NR	1
OH HIST LF	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
<b>Local Lists of Hazardous waste / Contaminated Sites</b>								
US CDL	TP		NR	NR	NR	NR	NR	0
OH CDL	TP		NR	NR	NR	NR	NR	0
US HIST CDL	TP		NR	NR	NR	NR	NR	0
<b>Local Lists of Registered Storage Tanks</b>								
OH ARCHIVE UST	0.250		1	0	NR	NR	NR	1
<b>Local Land Records</b>								
LIENS 2	TP		NR	NR	NR	NR	NR	0
<b>Records of Emergency Release Reports</b>								
HMIRS	TP	1	NR	NR	NR	NR	NR	0
OH SPILLS	TP		NR	NR	NR	NR	NR	1
OH SPILLS 90	TP		NR	NR	NR	NR	NR	0
OH SPILLS 80	TP		NR	NR	NR	NR	NR	0

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b><i>Other Ascertainable Records</i></b>								
RCRA NonGen / NLR	0.250		0	0	NR	NR	NR	0
DOT OPS	TP		NR	NR	NR	NR	NR	0
DOD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
HIST FTTS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ICIS	TP	1	NR	NR	NR	NR	NR	1
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
RADINFO	TP		NR	NR	NR	NR	NR	0
FINDS	TP	1	NR	NR	NR	NR	NR	1
RAATS	TP		NR	NR	NR	NR	NR	0
RMP	TP		NR	NR	NR	NR	NR	0
OH TOWNGAS	1.000		0	0	0	0	NR	0
OH UIC	TP		NR	NR	NR	NR	NR	0
NY MANIFEST	0.250	1	0	0	NR	NR	NR	1
OH DRYCLEANERS	0.250		0	0	NR	NR	NR	0
OH NPDES	TP		NR	NR	NR	NR	NR	0
OH AIRS	TP		NR	NR	NR	NR	NR	0
OH USD	0.500		0	0	0	NR	NR	0
OH HIST USD	0.500		0	0	0	NR	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
OH CRO	TP		NR	NR	NR	NR	NR	0
OH COAL ASH	0.500		0	0	0	NR	NR	0
OH Financial Assurance	TP		NR	NR	NR	NR	NR	0
US AIRS	TP		NR	NR	NR	NR	NR	0
US FIN ASSUR	TP		NR	NR	NR	NR	NR	0
EPA WATCH LIST	TP		NR	NR	NR	NR	NR	0
PRP	TP		NR	NR	NR	NR	NR	0
PCB TRANSFORMER	TP		NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
COAL ASH DOE	TP		NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	TP		NR	NR	NR	NR	NR	0

### **EDR HIGH RISK HISTORICAL RECORDS**

#### ***EDR Exclusive Records***

EDR MGP	1.000		0	0	0	0	NR	0
EDR US Hist Auto Stat	0.250		0	0	NR	NR	NR	0

## MAP FINDINGS SUMMARY

<u>Database</u>	<u>Search Distance (Miles)</u>	<u>Target Property</u>	<u>&lt; 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>&gt; 1</u>	<u>Total Plotted</u>
EDR US Hist Cleaners	0.250		0	0	NR	NR	NR	0

### NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

N/A = This State does not maintain a SHWS list. See the Federal CERCLIS list.

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**A1** **UNITED STATES PLAYING CARD CO**  
**Target** **4590 BEECH STREET CINCINNATI OH 452123449**  
**Property** **CINCINNATI, OH 45212**

**ICIS** **1011603617**  
**N/A**

**Site 1 of 3 in cluster A**

**Actual:**  
**622 ft.**

**ICIS:**

Enforcement Action ID: 05-1986-0170  
FRS ID: 110008118214  
Program ID: OH-CORE 21089  
Action Name: U.S. PLAYING CARD CO.  
Facility Name: UNITED STATES PLAYING CARD CO  
Facility Address: 4590 BEECH STREET CINCINNATI OH 452123449  
CINCINNATI, Ohio 452123449  
Enforcement Action Type: CAA 113 Notice Of Violation  
Facility County: Hamilton  
EPA Region #: 5

Enforcement Action ID: 05-1986-0170  
FRS ID: 110008118214  
Program ID: AIRS/AFS 3906100048  
Action Name: U.S. PLAYING CARD CO.  
Facility Name: UNITED STATES PLAYING CARD CO.  
Facility Address: 4590 BEECH STREET CINCINNATI OH 452123449  
CINCINNATI, Ohio 452123449  
Enforcement Action Type: CAA 113 Notice Of Violation  
Facility County: Hamilton  
EPA Region #: 5

Enforcement Action ID: 05-1986-0170  
FRS ID: 110008118214  
Program ID: NEI NTI40448  
Action Name: U.S. PLAYING CARD CO.  
Facility Name: UNITED STATES PLAYING CARD CO.  
Facility Address: 4590 BEECH STREET CINCINNATI OH 452123449  
CINCINNATI, Ohio 452123449  
Enforcement Action Type: CAA 113 Notice Of Violation  
Facility County: Hamilton  
EPA Region #: 5

Enforcement Action ID: 05-1986-0170  
FRS ID: 110008118214  
Program ID: FRS 110008118214  
Action Name: U.S. PLAYING CARD CO.  
Facility Name: UNITED STATES PLAYING CARD CO  
Facility Address: 4590 BEECH STREET CINCINNATI OH 452123449  
CINCINNATI, Ohio 452123449  
Enforcement Action Type: CAA 113 Notice Of Violation  
Facility County: Hamilton  
EPA Region #: 5

Enforcement Action ID: 05-1986-0170  
FRS ID: 110008118214  
Program ID: NEI NEI40448  
Action Name: U.S. PLAYING CARD CO.  
Facility Name: Not reported  
Facility Address: 4590 BEECH STREET CINCINNATI OH 452123449  
CINCINNATI, Ohio 452123449  
Enforcement Action Type: CAA 113 Notice Of Violation

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1011603617**

Facility County: Hamilton  
EPA Region #: 5  
  
Enforcement Action ID: 05-1986-0170  
FRS ID: 110008118214  
Program ID: RCRAINFO OHD004234217  
Action Name: U.S. PLAYING CARD CO.  
Facility Name: UNITED STATES PLAYING CARD CO  
Facility Address: 4590 BEECH STREET CINCINNATI OH 452123449  
CINCINNATI, Ohio 452123449  
  
Enforcement Action Type: CAA 113 Notice Of Violation  
Facility County: Hamilton  
EPA Region #: 5

Program ID: AIRS/AFS 3906100048  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2732  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: AIRS/AFS 3906100048  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2752  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: AIRS/AFS 3906100048  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3944  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: FRS 110008118214  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2732  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: FRS 110008118214  
Facility Name: UNITED STATES PLAYING CARD CO

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1011603617**

Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2752  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: FRS 110008118214  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3944  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: NEI NEI40448  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2732  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: NEI NEI40448  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2752  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: NEI NEI40448  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3944  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: NEI NTI40448  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2732  
Latitude: 39.15888  
Longitude: -84.44298

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1011603617**

Program ID: NEI NTI40448  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2752  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: NEI NTI40448  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3944  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: OH-CORE 21089  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2732  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: OH-CORE 21089  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2752  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: OH-CORE 21089  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3944  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: RCRAINFO OHD004234217  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2732

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1011603617**

Latitude: 39.15888  
Longitude: -84.44298

Program ID: RCRAINFO OHD004234217  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 2752  
Latitude: 39.15888  
Longitude: -84.44298

Program ID: RCRAINFO OHD004234217  
Facility Name: UNITED STATES PLAYING CARD CO  
Address: 4590 BEECH STREET  
Tribal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3944  
Latitude: 39.15888  
Longitude: -84.44298

**A2**  
**Target**  
**Property**

**UNITED STATES PLAYING CARD CO**  
**PARK AVE AND BEECH ST**  
**CINCINNATI, OH 45212**

**CERC-NFRAP**  
**RCRA-SQG**  
**FINDS**  
**OH DERR**  
**NY MANIFEST**

**1000398763**  
**OHD004234217**

**Site 2 of 3 in cluster A**

**Actual:**  
**622 ft.**

CERC-NFRAP:  
Site ID: 0504176  
Federal Facility: Not a Federal Facility  
NPL Status: Not on the NPL  
Non NPL Status: NFRAP-Site does not qualify for the NPL based on existing information

**CERCLIS-NFRAP Assessment History:**

Action: DISCOVERY  
Date Started: / /  
Date Completed: 08/01/80  
Priority Level: Not reported

Action: ARCHIVE SITE  
Date Started: / /  
Date Completed: 09/25/85  
Priority Level: Not reported

Action: PRELIMINARY ASSESSMENT  
Date Started: / /  
Date Completed: 09/25/85  
Priority Level: NFRAP-Site does not qualify for the NPL based on existing information

**RCRA-SQG:**

Date form received by agency: 08/11/1980  
Facility name: UNITED STATES PLAYING CARD CO  
Facility address: PARK AVE AND BEECH ST  
CINCINNATI, OH 45212  
EPA ID: OHD004234217

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1000398763**

Contact: WILLIAM MARTIN  
Contact address: PARK AVE AND BEECH ST  
CINCINNATI, OH 45212  
  
Contact country: US  
Contact telephone: (513) 396-5700  
Contact email: Not reported  
EPA Region: 05  
Land type: Facility is not located on Indian land. Additional information is not known.  
Classification: Small Small Quantity Generator  
Description: Handler: generates more than 100 and less than 1000 kg of hazardous waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of hazardous waste at any time

**Owner/Operator Summary:**

Owner/operator name: NAME NOT REPORTED  
Owner/operator address: ADDRESS NOT REPORTED  
CITY NOT REPORTED, AK 99998  
  
Owner/operator country: Not reported  
Owner/operator telephone: (312) 555-1212  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Owner/operator name: NAME NOT REPORTED  
Owner/operator address: ADDRESS NOT REPORTED  
CITY NOT REPORTED, AK 99998  
  
Owner/operator country: Not reported  
Owner/operator telephone: (312) 555-1212  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

**Handler Activities Summary:**

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
Used oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

**Hazardous Waste Summary:**

Waste code: D000  
Waste name: Not Defined

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1000398763**

Waste code: F001  
Waste name: THE FOLLOWING SPENT HALOGENATED SOLVENTS USED IN DEGREASING: TETRACHLOROETHYLENE, TRICHLOROETHYLENE, METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE, AND CHLORINATED FLUOROCARBONS; ALL SPENT SOLVENT MIXTURES/BLENDS USED IN DEGREASING CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Waste code: U226  
Waste name: ETHANE, 1,1,1-TRICHLORO-

**Facility Has Received Notices of Violations:**

Regulation violated: SR - 3745-52-41  
Area of violation: Generators - Records/Reporting  
Date violation determined: 09/22/2005  
Date achieved compliance: 01/16/2009  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 09/22/2005  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

**Evaluation Action Summary:**

Evaluation date: 01/24/2012  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 09/22/2005  
Evaluation: NON-FINANCIAL RECORD REVIEW  
Area of violation: Generators - Records/Reporting  
Date achieved compliance: 01/16/2009  
Evaluation lead agency: State

**FINDS:**

Registry ID: 110008118214

**Environmental Interest/Information System**

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1000398763**

The OH-CORE (Ohio - Core) database contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases.

ICIS (Integrated Compliance Information System) is the Integrated Compliance Information System and provides a database that, when complete, will contain integrated Enforcement and Compliance information across most of EPA's programs. The vision for ICIS is to replace EPA's independent databases that contain Enforcement data with a single repository for that information. Currently, ICIS contains all Federal Administrative and Judicial enforcement actions. This information is maintained in ICIS by EPA in the Regional offices and its Headquarters. A future release of ICIS will replace the Permit Compliance System (PCS) which supports the NPDES and will integrate that information with Federal actions already in the system. ICIS also has the capability to track other activities occurring in the Region that support Compliance and Enforcement programs. These include; Incident Tracking, Compliance Assistance, and Compliance Monitoring.

**DERR:**

DERR ID: 531000846  
District: SWDO  
Alias: Not reported  
Lat/Long: 39.1588 -84.4413  
EPA ID: OHD004234217  
**Program: Site Assessment**

**NY MANIFEST:**

EPA ID: OHD004234217  
Country: USA  
Mailing Name: U S PLAYING CARD CORPORATION  
Mailing Contact: MIKE MASSAY  
Mailing Address: 4590 BEECH ST  
Mailing Address 2: Not reported  
Mailing City: CINCINNATI  
Mailing State: OH  
Mailing Zip: 45212  
Mailing Zip4: Not reported  
Mailing Country: USA  
Mailing Phone: 513-396-5700

Document ID: NYB4209552  
Manifest Status: Completed copy  
Trans1 State ID: OHT56JZ  
Trans2 State ID: Not reported  
Generator Ship Date: 950124  
Trans1 Recv Date: 950124  
Trans2 Recv Date: Not reported  
TSD Site Recv Date: 950126  
Part A Recv Date: Not reported  
Part B Recv Date: 950209

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED STATES PLAYING CARD CO (Continued)**

**1000398763**

Generator EPA ID: OHD004234217  
Trans1 EPA ID: OH0000000539  
Trans2 EPA ID: Not reported  
TSDF ID: NYD049836679  
Waste Code: B007 - OTHER MISCELLANEOUS PCB WASTES  
Quantity: 07902  
Units: K - Kilograms (2.2 pounds)  
Number of Containers: 001  
Container Type: CM - Metal boxes, cases, roll-offs  
Handling Method: L Landfill.  
Specific Gravity: 100  
Year: 95

**A3  
Target  
Property**

**FOX MIDWEST TRUCKING  
4590 BEECH RD  
CINCINNATI, OH**

**OH SPILLS**

**S106325511  
N/A**

**Site 3 of 3 in cluster A**

**Actual:  
622 ft.**

SPILLS:  
Spill No.: 9504-31-1497  
Spill Year: 1995  
Date Spill Reported: 04/21/1995  
Spill Month: 4  
Spill Number: 1497  
Reporter Name: DISPATCHER GAYLE  
Confidential: No  
District Code: SW  
Employee Number: Not reported  
Lat/Long: Not reported  
Product Spilled Name: DIESEL FUEL

**4  
South  
< 1/8  
0.066 mi.  
351 ft.**

**DI-NA-CAL LABEL GROUP NORWOOD PLANT \*  
4500 BEECH STREET  
NORWOOD, OH**

**RCRA-LQG  
FINDS  
OH UST  
OH ARCHIVE UST  
US AIRS**

**1000146239  
OHD056487101**

**Relative:  
Lower**

RCRA-LQG:  
Date form received by agency: 02/16/2012  
Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT  
Facility address: 4500 BEECH STREET  
CINCINNATI, OH 45212  
EPA ID: OHD056487101  
Contact: LUKE GAMBLE  
Contact address: 4500 BEECH STREET  
CINCINNATI, OH 45212  
Contact country: US  
Contact telephone: (513) 396-5625  
Contact email: LUKE.GAMBLE@GRAPHICPKG.COM  
EPA Region: 05  
Land type: Private  
Classification: Large Quantity Generator  
Description: Handler: generates 1,000 kg or more of hazardous waste during any calendar month; or generates more than 1 kg of acutely hazardous waste during any calendar month; or generates more than 100 kg of any

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month; or generates 1 kg or less of acutely hazardous waste during any calendar month, and accumulates more than 1 kg of acutely hazardous waste at any time; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates more than 100 kg of that material at any time

Owner/Operator Summary:

Owner/operator name: BLUEGRASS LABELS COMPANY LLC  
Owner/operator address: 4500 BEECH STREET  
CINCINNATI, OH 45212  
Owner/operator country: US  
Owner/operator telephone: (513) 396-5625  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: 03/01/2008  
Owner/Op end date: Not reported

Owner/operator name: GRAPHIC PACKAGING INT'L  
Owner/operator address: 4500 BEECH STREET  
CINCINNATI, OH 45212  
Owner/operator country: US  
Owner/operator telephone: (513) 396-5625  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: 03/01/2008  
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
Used oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

Historical Generators:

Date form received by agency: 02/22/2010  
Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT  
Classification: Large Quantity Generator

Date form received by agency: 03/03/2009  
Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT  
Classification: Large Quantity Generator

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)**

**1000146239**

Date form received by agency: 02/29/2008

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: BLUEGRASS LABELS

Classification: Large Quantity Generator

Date form received by agency: 02/14/2007

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: BLUEGRASS LABELS

Classification: Large Quantity Generator

Date form received by agency: 07/31/2006

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: BLUEGRASS LABELS DBA ALTVITY PACKAGING

Classification: Large Quantity Generator

Date form received by agency: 02/21/2006

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: SMURFIT STONE CONTAINER ENTERPRISES INC

Classification: Large Quantity Generator

Date form received by agency: 02/25/2005

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: SMURFIT STONE CONTAINER ENTERPRISES INC

Classification: Large Quantity Generator

Date form received by agency: 02/24/2004

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: SMURFIT STONE CONTAINER CORP

Classification: Large Quantity Generator

Date form received by agency: 02/24/2003

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: JEFFERSON SMURFIT CORPORATION (U.S.)

Classification: Large Quantity Generator

Date form received by agency: 05/25/2002

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: JEFFERSON SMURFIT DI-NA-CAL LABEL GROUP

Classification: Large Quantity Generator

Date form received by agency: 02/16/2000

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: JEFFERSON SMURFIT CORP DINAGRAPHSICS DIV

Classification: Large Quantity Generator

Date form received by agency: 02/18/1998

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: JEFFERSON SMURFIT CORP DINAGRAPHSICS DIV

Classification: Large Quantity Generator

Date form received by agency: 02/07/1996

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Site name: JEFFERSON SMURFIT CORP DINAGRAPHSICS DIV

Classification: Large Quantity Generator

Date form received by agency: 01/28/1994

Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Site name: DINAGRAPHICS  
Classification: Large Quantity Generator

Date form received by agency: 02/19/1992  
Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT  
Site name: DINAGRAPHICS  
Classification: Large Quantity Generator

Date form received by agency: 02/13/1990  
Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT  
Site name: DINAGRAPHICS INC  
Classification: Large Quantity Generator

Date form received by agency: 07/24/1980  
Facility name: GRAPHIC PACKAGING INTERNATIONAL DINACAL LABEL PLANT  
Site name: DINAGRAPHICS INC  
Classification: Large Quantity Generator

Hazardous Waste Summary:

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Waste code: D005  
Waste name: BARIUM

Waste code: D035  
Waste name: METHYL ETHYL KETONE

Waste code: F003  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Waste code: F005  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Biennial Reports:

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Last Biennial Reporting Year: 2013

Annual Waste Handled:

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.  
Amount (Lbs): 272693

Waste code: D005  
Waste name: BARIUM  
Amount (Lbs): 272693

Waste code: D035  
Waste name: METHYL ETHYL KETONE  
Amount (Lbs): 272693

Waste code: F003  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.  
Amount (Lbs): 272693

Waste code: F005  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.  
Amount (Lbs): 272693

Facility Has Received Notices of Violations:

Regulation violated: Not reported  
Area of violation: Universal Waste - Small Quantity Handlers  
Date violation determined: 01/05/2012  
Date achieved compliance: 01/05/2012  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/22/2012  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/30/2011  
Date achieved compliance: 11/30/2011  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/21/2011  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: TSD IS-Container Use and Management  
Date violation determined: 12/10/2007  
Date achieved compliance: 12/10/2007  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/13/2007  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/10/2007  
Date achieved compliance: 12/10/2007  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/13/2007  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: TSD IS-Container Use and Management  
Date violation determined: 12/10/2007  
Date achieved compliance: 12/27/2007  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/13/2007  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 04/10/2002  
Date achieved compliance: 04/24/2002  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/19/2002  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-73(A)  
Area of violation: Generators - General  
Date violation determined: 04/10/2002  
Date achieved compliance: 04/10/2002  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/19/2002  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74  
Area of violation: Generators - Pre-transport  
Date violation determined: 04/10/2002  
Date achieved compliance: 04/10/2002  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/19/2002  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 01/05/2012  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Universal Waste - Small Quantity Handlers  
Date achieved compliance: 01/05/2012  
Evaluation lead agency: State

Evaluation date: 11/30/2011  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 11/30/2011  
Evaluation lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Evaluation date:	12/27/2007
Evaluation:	NON-FINANCIAL RECORD REVIEW
Area of violation:	Not reported
Date achieved compliance:	Not reported
Evaluation lead agency:	State
Evaluation date:	12/10/2007
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	TSD IS-Container Use and Management
Date achieved compliance:	12/10/2007
Evaluation lead agency:	State
Evaluation date:	12/10/2007
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	Generators - Pre-transport
Date achieved compliance:	12/10/2007
Evaluation lead agency:	State
Evaluation date:	12/10/2007
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	TSD IS-Container Use and Management
Date achieved compliance:	12/27/2007
Evaluation lead agency:	State
Evaluation date:	04/10/2002
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	Generators - Pre-transport
Date achieved compliance:	04/24/2002
Evaluation lead agency:	State
Evaluation date:	04/10/2002
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	Generators - Pre-transport
Date achieved compliance:	04/10/2002
Evaluation lead agency:	State
Evaluation date:	04/10/2002
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	Generators - General
Date achieved compliance:	04/10/2002
Evaluation lead agency:	State
Evaluation date:	06/19/1985
Evaluation:	COMPLIANCE EVALUATION INSPECTION ON-SITE
Area of violation:	Not reported
Date achieved compliance:	Not reported
Evaluation lead agency:	State

FINDS:

Registry ID: 110000393057

Environmental Interest/Information System

AFS (Aerometric Information Retrieval System (AIRS) Facility Subsystem) replaces the former Compliance Data System (CDS), the National Emission Data System (NEDS), and the Storage and Retrieval of Aerometric Data (SAROAD). AIRS is the national repository for information concerning airborne pollution in the United States. AFS is

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used to track emissions and compliance data from industrial plants. AFS data are utilized by states to prepare State Implementation Plans to comply with regulatory programs and by EPA as an input for the estimation of total national emissions. AFS is undergoing a major redesign to support facility operating permits required under Title V of the Clean Air Act.

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

**HAZARDOUS WASTE BIENNIAL REPORTER**

**CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY**

The OH-CORE (Ohio - Core) database contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases.

ICIS (Integrated Compliance Information System) is the Integrated Compliance Information System and provides a database that, when complete, will contain integrated Enforcement and Compliance information across most of EPA's programs. The vision for ICIS is to replace EPA's independent databases that contain Enforcement data with a single repository for that information. Currently, ICIS contains all Federal Administrative and Judicial enforcement actions. This information is maintained in ICIS by EPA in the Regional offices and at Headquarters. A future release of ICIS will replace the Permit Compliance System (PCS) which supports the NPDES and will integrate that information with Federal actions already in the system. ICIS also has the capability to track other activities occurring in the Region that support Compliance and Enforcement programs. These include; Incident Tracking, Compliance Assistance, and Compliance Monitoring.

US EPA RACT/BACT/LAER Clearinghouse (RBLC) database contains case-specific information on the "Best Available" air pollution technologies that have been required to reduce the emission of air pollutants from stationary sources (e.g., power plants, steel mills, chemical plants, etc.). RACT, or Reasonably Available Control Technology, is required on existing sources in areas that are not meeting national ambient air quality standards. BACT, or Best Available Control Technology, is required on major new or modified

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sources in clean areas. LAER, or Lowest Achievable Emission Rate, is required on major new or modified sources in non-attainment areas.

**UST:**

Facility Id: 31000033  
Facility Type: Industrial  
Owner Name: BLUEGRASS LABELS COMPANY LLC  
Owner Address: 4500 BEECH ST  
Owner City/State/Zip: 45212  
  
Tank Number: T00001  
Status: CIU - Currently In Use  
UST Capacity: 5000  
Tank Content: Other Petroleum Distillate  
Installation Date: 12/01/1988  
Construction: CCPS - Coated/Cathodically Protected Steel

Tank Number: T00002  
Status: CIU - Currently In Use  
UST Capacity: 5000  
Tank Content: Hazardous Substance  
Installation Date: 12/01/1988  
Construction: CCPS - Coated/Cathodically Protected Steel

Tank Number: T00003  
Status: CIU - Currently In Use  
UST Capacity: 5000  
Tank Content: Hazardous Substance  
Installation Date: 12/01/1988  
Construction: CCPS - Coated/Cathodically Protected Steel

Tank Number: T00004  
Status: CIU - Currently In Use  
UST Capacity: 5000  
Tank Content: Hazardous Substance  
Installation Date: 12/01/1988  
Construction: CCPS - Coated/Cathodically Protected Steel

**ARCHIVE UST:**

Facility Number: 31000033

**Permit:**

Facility Id: 31000033  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 11/12/1999  
Lfd Permit Id: Not reported

Facility Id: 31000033  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 11/12/1999  
Lfd Permit Id: Not reported

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Facility Id: 31000033  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 11/12/1999  
Lfd Permit Id: Not reported

Inspection:

Facility Id: 31000033  
Code: 102  
Permit Number: P00001  
Inspection Type: Final

Tanks:

Tank ID: T00001  
**Tank Status:** **Currently In Use**  
Tank Type: CCPS - Coated/Cathodically Protected Steel  
Capacity: 5000  
Content: Other Petroleum Distillate  
CAS #: Not reported  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 12/1/1988  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: FACA - Factory Installed Anodes  
Release Detection on Tank: Automatic Tank Gauging;Interstitial Monitoring Double Walled  
Corrosion Protection Piping: NCWG - No Piping In Contact With  
Piping Material: BM - Bare Metal  
Piping Type: Pressure  
Release Detection on Piping: Mechanical Line Leak Detector

Tank ID: T00002  
**Tank Status:** **Currently In Use**  
Tank Type: CCPS - Coated/Cathodically Protected Steel  
Capacity: 5000  
Content: Hazardous Substance  
CAS #: Not reported  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 12/1/1988  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: FACA - Factory Installed Anodes  
Release Detection on Tank: Automatic Tank Gauging;Interstitial Monitoring Double Walled  
Corrosion Protection Piping: NCWG - No Piping In Contact With  
Piping Material: BM - Bare Metal  
Piping Type: Pressure  
Release Detection on Piping: Mechanical Line Leak Detector

Tank ID: T00003  
**Tank Status:** **Currently In Use**  
Tank Type: CCPS - Coated/Cathodically Protected Steel

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DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

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Capacity: 5000  
Content: Hazardous Substance  
CAS #: Not reported  
Regulated: No  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 12/1/1988  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: FACA - Factory Installed Anodes  
Release Detection on Tank: Automatic Tank Gauging;Interstitial Monitoring Double Walled  
Corrosion Protection Piping: NCWG - No Piping In Contact With  
Piping Material: BM - Bare Metal  
Piping Type: Pressure  
Release Detection on Piping: Mechanical Line Leak Detector

Tank ID: T00004  
**Tank Status:** **Currently In Use**  
Tank Type: CCPS - Coated/Cathodically Protected Steel  
Capacity: 5000  
Content: Hazardous Substance  
CAS #: Not reported  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 12/1/1988  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: FACA - Factory Installed Anodes  
Release Detection on Tank: Automatic Tank Gauging;Interstitial Monitoring Double Walled  
Corrosion Protection Piping: NCWG - No Piping In Contact With  
Piping Material: BM - Bare Metal  
Piping Type: Pressure  
Release Detection on Piping: Mechanical Line Leak Detector

AIRS (AFS):

Compliance and Violation Data Major Sources:

EPA plant ID: 110000393057  
Plant name: DINAGRAPHICS  
Plant address: 4500 BEECH STREET  
NORWOOD, OH 452121049  
County: HAMILTON  
Region code: 05  
Dunn & Bradst #: Not reported  
Air quality cntrl region: 079  
Sic code: 2754  
Sic code desc: COMMERCIAL PRINTING, GRAVURE  
North Am. industrial classf: 323111  
NAIC code description: Commercial Gravure Printing  
Default compliance status: IN VIOLATION - NO SCHEDULE  
Default classification: POTENTIAL EMISSIONS ARE BELOW ALL APPLICABLE MAJOR SOURCE THRESHOLDS  
IF AND ONLY IF THE SOURCE COMPLIES WITH FEDERALLY ENFORCEABLE  
REGULATIONS OR LIMITATIONS.

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**DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)**

**1000146239**

Govt facility: ALL OTHER FACILITIES NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR  
LOCAL GOVERNMENT  
Current HPV: Not reported

Compliance and Enforcement Major Issues:

Air program: SIP SOURCE  
National action type: MULTI MEDIA INSPECTION - LEVEL 2 OR GREATER  
Date achieved: 000615  
Penalty amount: 000000000

Air program: SIP SOURCE  
National action type: ST SOURCE TEST CONDUCTED  
Date achieved: 000621  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: STATE CONDUCTED PCE/ ON-SITE  
Date achieved: 021112  
Penalty amount: Not reported

Air program: TITLE V PERMITS  
National action type: OWNER/OPERATOR CONDUCTED SOURCE TEST  
Date achieved: 021112  
Penalty amount: 000000000

Air program: MACT (SECTION 63 NESHAPS)  
National action type: STATE CONDUCTED PCE/ ON-SITE  
Date achieved: 021112  
Penalty amount: Not reported

Air program: SIP SOURCE  
National action type: STATE CONDUCTED PCE/ ON-SITE  
Date achieved: 021112  
Penalty amount: Not reported

Air program: SIP SOURCE  
National action type: OWNER/OPERATOR CONDUCTED SOURCE TEST  
Date achieved: 021112  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: TITLE V COMPLIANCE CERT DUE/RECEIVED BY  
Date achieved: 040427  
Penalty amount: Not reported

Air program: SIP SOURCE  
National action type: COMPLIANCE CERTIFICATION STATE REVIEW  
Date achieved: 040707  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: COMPLIANCE CERTIFICATION STATE REVIEW  
Date achieved: 040707  
Penalty amount: 000000000

Air program: TITLE V PERMITS

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DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

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National action type:	STATE CONDUCTED FCE / OFF-SITE
Date achieved:	040819
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / OFF-SITE
Date achieved:	040819
Penalty amount:	000000000
Air program:	TITLE V PERMITS
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	040819
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	040819
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	040819
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	TITLE V COMPLIANCE CERT DUE/RECEIVED BY
Date achieved:	050429
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	COMPLIANCE CERTIFICATION EPA REVIEW
Date achieved:	050506
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	050805
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	050805
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	051117
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	051117
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	051117

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DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

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Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	051117
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	051117
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	051117
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE DAY 0
Date achieved:	060101
Penalty amount:	000000000
Air program:	TITLE V PERMITS
National action type:	STATE DAY 0
Date achieved:	060101
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	STATE DAY 0
Date achieved:	060101
Penalty amount:	000000000
Air program:	TITLE V PERMITS
National action type:	NXXXXX
Date achieved:	060323
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	NXXXXX
Date achieved:	060323
Penalty amount:	000000000
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	NXXXXX
Date achieved:	060323
Penalty amount:	000000000
Air program:	TITLE V PERMITS
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	060428
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	060428
Penalty amount:	Not reported

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Air program: SIP SOURCE  
National action type: TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY  
Date achieved: 060428  
Penalty amount: Not reported

Air program: MACT (SECTION 63 NESHAPS)  
National action type: STATE CONDUCTED FCE / OFF-SITE  
Date achieved: 060516  
Penalty amount: Not reported

Air program: SIP SOURCE  
National action type: STATE CONDUCTED FCE / OFF-SITE  
Date achieved: 060516  
Penalty amount: Not reported

Air program: TITLE V PERMITS  
National action type: STATE CONDUCTED FCE / OFF-SITE  
Date achieved: 060516  
Penalty amount: Not reported

Air program: TITLE V PERMITS  
National action type: COMPLIANCE CERTIFICATION STATE REVIEW  
Date achieved: 060621  
Penalty amount: Not reported

Air program: SIP SOURCE  
National action type: COMPLIANCE CERTIFICATION STATE REVIEW  
Date achieved: 060621  
Penalty amount: Not reported

Air program: MACT (SECTION 63 NESHAPS)  
National action type: COMPLIANCE CERTIFICATION STATE REVIEW  
Date achieved: 060621  
Penalty amount: Not reported

Air program: SIP SOURCE  
National action type: STATE REPORTED AS ADDED  
Date achieved: 060625  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: STATE REPORTED AS ADDED  
Date achieved: 060625  
Penalty amount: 000000000

Air program: MACT (SECTION 63 NESHAPS)  
National action type: STATE REPORTED AS ADDED  
Date achieved: 060625  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: STATE CONDUCTED PCE/ ON-SITE  
Date achieved: 060823  
Penalty amount: Not reported

Air program: MACT (SECTION 63 NESHAPS)  
National action type: STATE CONDUCTED PCE/ ON-SITE

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Date achieved:	060823
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	060823
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	EPA CONDUCTED PCE/ ON-SITE
Date achieved:	061012
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	EPA CONDUCTED PCE/ ON-SITE
Date achieved:	061012
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	EPA CONDUCTED PCE/ ON-SITE
Date achieved:	061012
Penalty amount:	Not reported
Air program:	CFC TRACKING
National action type:	Not reported
Date achieved:	061125
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	070215
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	070215
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	070215
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	070215
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	070215
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	070215
Penalty amount:	Not reported

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Air program:	CFC TRACKING
National action type:	EPA CONDUCTED PCE/ OFF-SITE
Date achieved:	070326
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	070430
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	070430
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	070430
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	070612
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	070612
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	070612
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	071024
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	071024
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	071024
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	071024
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST

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Date achieved:	071024
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED PCE/ ON-SITE
Date achieved:	071024
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE CONDUCTED FCE / OFF-SITE
Date achieved:	080305
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / OFF-SITE
Date achieved:	080305
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	STATE CONDUCTED FCE / OFF-SITE
Date achieved:	080305
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	080430
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	080430
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	080430
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	080625
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	080625
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	080625
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	COMPL BY STATE, NO ACT REQ
Date achieved:	080717
Penalty amount:	000000000

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DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

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Air program: MACT (SECTION 63 NESHAPS)  
National action type: FINAL COMPLIANCE  
Date achieved: 080717  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: FINAL COMPLIANCE  
Date achieved: 080717  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: SV RESOLVED  
Date achieved: 080717  
Penalty amount: 000000000

Air program: SIP SOURCE  
National action type: FINAL COMPLIANCE  
Date achieved: 080717  
Penalty amount: 000000000

Air program: SIP SOURCE  
National action type: SV RESOLVED  
Date achieved: 080717  
Penalty amount: 000000000

Air program: MACT (SECTION 63 NESHAPS)  
National action type: COMPL BY STATE, NO ACT REQ  
Date achieved: 080717  
Penalty amount: 000000000

Air program: MACT (SECTION 63 NESHAPS)  
National action type: SV RESOLVED  
Date achieved: 080717  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: COMPL BY STATE, NO ACT REQ  
Date achieved: 080717  
Penalty amount: 000000000

Air program: SIP SOURCE  
National action type: STATE SV REPORTED AS ADDRESSED  
Date achieved: 080910  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: STATE SV REPORTED AS ADDRESSED  
Date achieved: 080910  
Penalty amount: 000000000

Air program: MACT (SECTION 63 NESHAPS)  
National action type: STATE SV REPORTED AS ADDRESSED  
Date achieved: 080910  
Penalty amount: 000000000

Air program: TITLE V PERMITS  
National action type: TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY

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DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

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Date achieved:	090427
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	090427
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	090427
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	090501
Penalty amount:	Not reported
Air program:	TITLE V PERMITS
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	090501
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	090501
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	100224
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	100224
Penalty amount:	Not reported
Air program:	Not reported
National action type:	STATE CONDUCTED FCE / ON-SITE
Date achieved:	100224
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	100528
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	100528
Penalty amount:	Not reported
Air program:	Not reported
National action type:	TITLE V ANN COMPL CERT DUE/RCV BY PERMIT AUTHORITY
Date achieved:	100528
Penalty amount:	Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Air program:	SIP SOURCE
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	100630
Penalty amount:	Not reported
Air program:	Not reported
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	100630
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	COMPLIANCE CERTIFICATION STATE REVIEW
Date achieved:	100630
Penalty amount:	Not reported
Air program:	MACT (SECTION 63 NESHAPS)
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	120222
Penalty amount:	Not reported
Air program:	Not reported
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	120222
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	OWNER/OPERATOR CONDUCTED SOURCE TEST
Date achieved:	120222
Penalty amount:	Not reported
Air program:	SIP SOURCE
National action type:	EPA INSPECTION - LEVEL 2 OR GREATER
Date achieved:	970328
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	MULTI MEDIA INSPECTION - LEVEL 2 OR GREATER
Date achieved:	970610
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	ST SOURCE TEST CONDUCTED
Date achieved:	970909
Penalty amount:	000000000
Air program:	TITLE V PERMITS
National action type:	MULTI MEDIA INSPECTION - LEVEL 2 OR GREATER
Date achieved:	980622
Penalty amount:	000000000
Air program:	SIP SOURCE
National action type:	MULTI MEDIA INSPECTION - LEVEL 2 OR GREATER
Date achieved:	990824
Penalty amount:	000000000

Historical Compliance Minor Sources:

State compliance status: UNKNOWN COMPLIANCE STATUS

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)**

**1000146239**

Hist compliance date:	1001
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1002
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1003
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1004
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1101
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1102
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1103
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1104
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1201
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1202
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1203
Air prog code hist file:	CFC TRACKING
State compliance status:	UNKNOWN COMPLIANCE STATUS
Hist compliance date:	1204
Air prog code hist file:	CFC TRACKING
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1001
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1002
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1003

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)**

**1000146239**

Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1004
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1101
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1102
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1103
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1104
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1201
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1202
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1203
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN VIOLATION - NO SCHEDULE
Hist compliance date:	1204
Air prog code hist file:	MACT (SECTION 63 NESHAPS)
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1001
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1001
Air prog code hist file:	TITLE V PERMITS
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1002
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1002
Air prog code hist file:	TITLE V PERMITS
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1003
Air prog code hist file:	Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)**

**1000146239**

State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1003
Air prog code hist file:	TITLE V PERMITS
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1004
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1004
Air prog code hist file:	TITLE V PERMITS
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1101
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1101
Air prog code hist file:	TITLE V PERMITS
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1102
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1103
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1104
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1201
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1202
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1203
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - INSPECTION
Hist compliance date:	1204
Air prog code hist file:	Not reported
State compliance status:	IN COMPLIANCE - CERTIFICATION
Hist compliance date:	1001
Air prog code hist file:	SIP SOURCE
State compliance status:	IN COMPLIANCE - CERTIFICATION
Hist compliance date:	1002
Air prog code hist file:	SIP SOURCE
State compliance status:	IN COMPLIANCE - CERTIFICATION

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)**

**1000146239**

Hist compliance date:	1003
Air prog code hist file:	SIP SOURCE
State compliance status:	IN COMPLIANCE - CERTIFICATION
Hist compliance date:	1004
Air prog code hist file:	SIP SOURCE
State compliance status:	IN COMPLIANCE - CERTIFICATION
Hist compliance date:	1101
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1102
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1102
Air prog code hist file:	TITLE V PERMITS
State compliance status:	Not reported
Hist compliance date:	1103
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1103
Air prog code hist file:	TITLE V PERMITS
State compliance status:	Not reported
Hist compliance date:	1104
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1104
Air prog code hist file:	TITLE V PERMITS
State compliance status:	Not reported
Hist compliance date:	1201
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1201
Air prog code hist file:	TITLE V PERMITS
State compliance status:	Not reported
Hist compliance date:	1202
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1202
Air prog code hist file:	TITLE V PERMITS
State compliance status:	Not reported
Hist compliance date:	1203
Air prog code hist file:	SIP SOURCE
State compliance status:	Not reported
Hist compliance date:	1203

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DI-NA-CAL LABEL GROUP NORWOOD PLANT \* (Continued)

1000146239

Air prog code hist file: TITLE V PERMITS

State compliance status: Not reported

Hist compliance date: 1204

Air prog code hist file: SIP SOURCE

State compliance status: Not reported

Hist compliance date: 1204

Air prog code hist file: TITLE V PERMITS

B5  
WNW  
1/8-1/4  
0.237 mi.  
1253 ft.

SIEMENS ENERGY & AUTOMATION, INC.  
4620 FOREST AVENUE  
CINCINNATI, OH 45212

Site 1 of 2 in cluster B

RCRA-LQG  
TRIS  
FINDS  
US AIRS

1000297506  
45212SMNSN4620F

Relative:  
Higher

RCRA-LQG:

Date form received by agency: 03/07/2012

Facility name: SIEMENS INDUSTRY INC

Facility address: 4620 FOREST AVE

NORWOOD, OH 45212

EPA ID: OHD004258828

Contact: SCHWARBER C AARON

Contact address: 4620 FOREST AVE

NORWOOD, OH 45212

Contact country: US

Contact telephone: (513) 841-3443

Contact email: AARON.SCHWARBER@SIEMENS.COM

EPA Region: 05

Land type: Private

Classification: Large Quantity Generator

Description: Handler: generates 1,000 kg or more of hazardous waste during any calendar month; or generates more than 1 kg of acutely hazardous waste during any calendar month; or generates more than 100 kg of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month; or generates 1 kg or less of acutely hazardous waste during any calendar month, and accumulates more than 1 kg of acutely hazardous waste at any time; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates more than 100 kg of that material at any time

Owner/Operator Summary:

Owner/operator name: SIEMENS INDUSTRY, INC.

Owner/operator address: 333 OLD MILTON PARKWAY  
ALPHARETTA, GA 30005

Owner/operator country: US

Owner/operator telephone: (770) 751-2346

Legal status: Private

Owner/Operator Type: Operator

Owner/Op start date: 10/17/1977

Owner/Op end date: Not reported

Owner/operator name: SIEMENS INDUSTRY, INC.

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Owner/operator address: 3333 OLD MILTON PARKWAY  
ALPHARETTA, GA 30005  
Owner/operator country: US  
Owner/operator telephone: (770) 751-2346  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: 10/17/1977  
Owner/Op end date: Not reported

**Handler Activities Summary:**

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: Yes  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
Used oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

**Historical Generators:**

Date form received by agency: 01/29/2010  
Facility name: SIEMENS INDUSTRY INC  
Classification: Large Quantity Generator

Date form received by agency: 02/05/2009  
Facility name: SIEMENS INDUSTRY INC  
Site name: SIEMENS ENERGY & AUTOMATION  
Classification: Large Quantity Generator

Date form received by agency: 02/26/2008  
Facility name: SIEMENS INDUSTRY INC  
Site name: SIEMENS ENERGY & AUTOMATION  
Classification: Large Quantity Generator

Date form received by agency: 02/20/2007  
Facility name: SIEMENS INDUSTRY INC  
Site name: SIEMENS ENERGY & AUTOMATION  
Classification: Large Quantity Generator

Date form received by agency: 03/01/2006  
Facility name: SIEMENS INDUSTRY INC  
Site name: SIEMENS ENERGY & AUTOMATION INC  
Classification: Large Quantity Generator

Date form received by agency: 02/24/2005  
Facility name: SIEMENS INDUSTRY INC  
Site name: SIEMENS ENERGY & AUTOMATION  
Classification: Large Quantity Generator

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Date form received by agency: 02/21/2004

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC

Classification: Small Quantity Generator

Date form received by agency: 02/28/2003

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC

Classification: Small Quantity Generator

Date form received by agency: 02/15/2002

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC

Classification: Small Quantity Generator

Date form received by agency: 02/28/2000

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC.

Classification: Large Quantity Generator

Date form received by agency: 06/21/1999

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY AND AUTOMATION INC

Classification: Large Quantity Generator

Date form received by agency: 02/26/1998

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC.

Classification: Large Quantity Generator

Date form received by agency: 02/29/1996

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC.

Classification: Large Quantity Generator

Date form received by agency: 02/17/1994

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC

Classification: Large Quantity Generator

Date form received by agency: 02/24/1992

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC

Classification: Large Quantity Generator

Date form received by agency: 02/23/1990

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY & AUTOMATION INC

Classification: Large Quantity Generator

Date form received by agency: 11/14/1980

Facility name: SIEMENS INDUSTRY INC

Site name: SIEMENS ENERGY AND AUTOMATION INC

Classification: Not a generator, verified

Date form received by agency: 01/01/1979

Facility name: SIEMENS INDUSTRY INC

Map ID  
Direction  
Distance  
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MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Site name: SIEMENS ENERGY AND AUTOMATION INC  
Classification: Large Quantity Generator

**Hazardous Waste Summary:**

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Waste code: D002  
Waste name: A WASTE WHICH HAS A PH OF LESS THAN 2 OR GREATER THAN 12.5 IS CONSIDERED TO BE A CORROSIVE HAZARDOUS WASTE. SODIUM HYDROXIDE, A CAUSTIC SOLUTION WITH A HIGH PH, IS OFTEN USED BY INDUSTRIES TO CLEAN OR DEGREASE PARTS. HYDROCHLORIC ACID, A SOLUTION WITH A LOW PH, IS USED BY MANY INDUSTRIES TO CLEAN METAL PARTS PRIOR TO PAINTING. WHEN THESE CAUSTIC OR ACID SOLUTIONS BECOME CONTAMINATED AND MUST BE DISPOSED, THE WASTE WOULD BE A CORROSIVE HAZARDOUS WASTE.

Waste code: D009  
Waste name: MERCURY

Waste code: D035  
Waste name: METHYL ETHYL KETONE

Waste code: F003  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Waste code: F005  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

**Biennial Reports:**

Last Biennial Reporting Year: 2013

**Annual Waste Handled:**

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS

Map ID  
Direction  
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MAP FINDINGS

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**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Amount (Lbs): 27679

Waste code: D003  
Waste name: A MATERIAL IS CONSIDERED TO BE A REACTIVE HAZARDOUS WASTE IF IT IS NORMALLY UNSTABLE, REACTS VIOLENTLY WITH WATER, GENERATES TOXIC GASES WHEN EXPOSED TO WATER OR CORROSIVE MATERIALS, OR IF IT IS CAPABLE OF DETONATION OR EXPLOSION WHEN EXPOSED TO HEAT OR A FLAME. ONE EXAMPLE OF SUCH WASTE WOULD BY WASTE GUNPOWDER.

Amount (Lbs): 6100

Waste code: D009  
Waste name: MERCURY  
Amount (Lbs): 5

Waste code: D035  
Waste name: METHYL ETHYL KETONE  
Amount (Lbs): 23450

Waste code: F003  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Amount (Lbs): 27135

Waste code: F005  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Amount (Lbs): 27135

**Facility Has Received Notices of Violations:**

Regulation violated: Not reported  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/09/2010  
Date achieved compliance: 11/09/2010  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/01/2010  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

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Database(s)

EDR ID Number  
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**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: Universal Waste - Small Quantity Handlers  
Date violation determined: 11/09/2010  
Date achieved compliance: 03/09/2011  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/01/2010  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-41(A)(5)&(8)  
Area of violation: Generators - Records/Reporting  
Date violation determined: 03/29/2006  
Date achieved compliance: 04/03/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 03/29/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: State Statute or Regulation  
Date violation determined: 04/07/2005  
Date achieved compliance: 11/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 11/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 4400  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: State Statute or Regulation  
Date violation determined: 04/07/2005  
Date achieved compliance: 11/13/2006  
Violation lead agency: State  
Enforcement action: NOV/INITIAL STATE ADMIN CONSENT ORDER  
Enforcement action date: 07/21/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-73(A)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 12/07/1999  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(E)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/10/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(A)(2)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-34(A)(3)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 12/07/1999  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(D)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-34(C)(1)(b)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(D)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(A)(2)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(B)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(F)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/10/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(D)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/10/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(F)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-34(A)(2)

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 12/07/1999  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(E)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33(A)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(D)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33(A)  
Area of violation: Generators - Pre-transport

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(F)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(E)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 03/31/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 12/20/1999  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(B)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999  
Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(D)  
Area of violation: Generators - Pre-transport  
Date violation determined: 12/07/1999

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Date achieved compliance: 02/10/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 01/28/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

**Evaluation Action Summary:**

Evaluation date: 11/09/2010  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Universal Waste - Small Quantity Handlers  
Date achieved compliance: 03/09/2011  
Evaluation lead agency: State

Evaluation date: 11/09/2010  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 11/09/2010  
Evaluation lead agency: State

Evaluation date: 11/13/2006  
Evaluation: NOT A SIGNIFICANT NON-COMPLIER  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 03/29/2006  
Evaluation: NON-FINANCIAL RECORD REVIEW  
Area of violation: Generators - Records/Reporting  
Date achieved compliance: 04/03/2006  
Evaluation lead agency: State

Evaluation date: 03/07/2006  
Evaluation: SIGNIFICANT NON-COMPLIER  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 04/07/2005  
Evaluation: NON-FINANCIAL RECORD REVIEW  
Area of violation: State Statute or Regulation  
Date achieved compliance: 11/13/2006  
Evaluation lead agency: State

Evaluation date: 12/07/1999  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 12/07/1999  
Evaluation lead agency: State

Evaluation date: 12/07/1999  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

Date achieved compliance: 02/10/2000  
Evaluation lead agency: State  
  
Evaluation date: 12/07/1999  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 03/31/2000  
Evaluation lead agency: State

**TRIS:**

[Click this hyperlink](#) while viewing on your computer to access  
7 additional US\_TRIS: record(s) in the EDR Site Report.

**FINDS:**

Registry ID: 110001626535

**Environmental Interest/Information System**

NCDB (National Compliance Data Base) supports implementation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Toxic Substances Control Act (TSCA). The system tracks inspections in regions and states with cooperative agreements, enforcement actions, and settlements.

AFS (Aerometric Information Retrieval System (AIRS) Facility Subsystem) replaces the former Compliance Data System (CDS), the National Emission Data System (NEDS), and the Storage and Retrieval of Aerometric Data (SAROAD). AIRS is the national repository for information concerning airborne pollution in the United States. AFS is used to track emissions and compliance data from industrial plants. AFS data are utilized by states to prepare State Implementation Plans to comply with regulatory programs and by EPA as an input for the estimation of total national emissions. AFS is undergoing a major redesign to support facility operating permits required under Title V of the Clean Air Act.

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

**HAZARDOUS WASTE BIENNIAL REPORTER**

The OH-CORE (Ohio - Core) database contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases.

**AIRS (AFS):**

**Airs Minor Details:**

EPA plant ID: 110001626535  
Plant name: SIEMENS ENERGY & AUTOMATION, INC.  
Plant address: 4620 FOREST AVENUE  
CINCINNATI, OH 45212  
County: HAMILTON  
Region code: 05  
Dunn & Bradst #: 004258828  
Air quality cntrl region: 079  
Sic code: 3621  
Sic code desc: MOTOR AND GENERATORS  
North Am. industrial classf: 335312  
NAIC code description: Motor and Generator Manufacturing  
Default compliance status: IN COMPLIANCE - CERTIFICATION  
Default classification: POTENTIAL UNCONTROLLED EMISSIONS < 100 TONS/YEAR  
Govt facility: ALL OTHER FACILITIES NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR  
LOCAL GOVERNMENT  
Current HPV: Not reported

**Historical Compliance Minor Sources:**

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1001  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1003  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1101  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1102  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1104  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1202  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1203  
Air prog code hist file: SIP SOURCE

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS ENERGY & AUTOMATION, INC. (Continued)**

**1000297506**

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1002  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1004  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1103  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1201  
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - CERTIFICATION  
Hist compliance date: 1204  
Air prog code hist file: SIP SOURCE

Compliance & Violation Data by Minor Sources:

Air program code: SIP SOURCE  
Plant air program pollutant: VOLATILE ORGANIC COMPOUNDS  
Default pollutant classification: POTENTIAL UNCONTROLLED EMISSIONS < 100 TONS/YEAR  
Def. poll. compliance status: IN COMPLIANCE - CERTIFICATION  
Def. attainment/non attainment: Not reported  
Repeat violator date: Not reported  
Turnover compliance: Not reported

**B6**  
**WNW**  
**1/8-1/4**  
**0.237 mi.**  
**1253 ft.**

**SIEMENS INDUSTRY**  
**4620 FOREST AVE**  
**NORWOOD, OH 45212**

**OH UNREG LTANKS**  
**OH NPDES**

**S105904577**  
**N/A**

**Site 2 of 2 in cluster B**

**Relative:**  
**Higher**

**UNREG LTANKS:**

**Facility Status: Release is Confirmed**

**Actual:**  
**629 ft.**

Facility Id:	311757	Facility County #:	061
Facility Track:	0	Facility Phone:	513-841-3497
Report Number:	319190	Incident Number:	31919000
RP Status:	Not reported	RP Search Date:	Not reported
Inspector:	Not reported	Coordinator:	COCA
Revised Date:	08/31/90	Fiscal Tracking:	9000
Class:	D	Priority:	2
Vacant:	Not reported	Lust Trust Fund:	2
Emrgncy Resp:	2	ER By:	Not reported
Authorized By:	HODNETT	Authorized Date:	08/31/90
Added Date:	Not reported	Entry By:	UNGER
Owner Name:	SIEMENS ENERGY & AUTOMATION		
Owner Address:	Not reported		
Owner City,St,Zip:	Not reported		
Owner Phone:	Not reported		
Operator Name:	Not reported		
Operator Address:	Not reported		
Operator C,S,Z:	Not reported		
Operator Phone:	Not reported		
Remarks:	0		

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SIEMENS INDUSTRY (Continued)**

**S105904577**

Summary: Not reported

OH NPDES:

Issue Date: 04/26/2006  
Township: Not reported  
Facility Npdes Permit: 1GC01790\*AG  
Applicant Name: PAUL HEMMER CONSTRUCTION CO  
Applicant Address: 250 GRANDVIEW DR FORT MITCHELL, KY 41017

Issue Date: 11/08/2000  
Township: Not reported  
Facility Npdes Permit: 1GR00503\*AG  
Applicant Name: SIEMENS INDUSTRY  
Applicant Address: 4620 FOREST AVE NORWOOD, OH 45212

Issue Date: 04/17/2012  
Township: Not reported  
Facility Npdes Permit: 1GR00503\*B  
Applicant Name: SIEMENS INDUSTRY  
Applicant Address: 4620 FOREST AVE NORWOOD, OH 45212

7  
SW  
1/4-1/2  
0.309 mi.  
1632 ft.

**KNOWLTON MFG.**  
**2524 LESLIE AVE**  
**CINCINNATI, OH 45212**

OH UIC  
OH LUST  
OH ARCHIVE UST  
**U004094503**  
**N/A**

**Relative:**  
**Higher**

UIC:

Facility Status: Temporarily Abandoned  
UIC Number: Not reported  
Type Of UIC Well: Remediation Well  
Well Status: Not reported  
AUT Status: Rule Authorization  
Latitude: Not reported  
Longitude: Not reported  
Number Of UIC Wells: Not reported  
Well Site: Class V  
Type Description: Not reported

**Actual:**  
**630 ft.**

LUST:

Release Number: 31001415-N00001  
Release Date: 08/14/1995  
**Facility Status: Active**  
LTF Status: 1 SUS/CON from regulated UST  
**FR Status: T2E: Tier 2 Evaluation**  
Priority: 2  
Review Date: 03/07/2013  
Class: Viable Responsible Party has been identified

ARCHIVE UST:

Facility Number: 31001415

Permit:

Facility Id: 31001415  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 7/26/1995

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**KNOWLTON MFG. (Continued)**

**U004094503**

Lfd Permit Id: Not reported

Facility Id: 31001415  
Permit Id: P00002  
Permit Status: Expired  
Issued Date: 8/16/1999  
Lfd Permit Id: Not reported

Inspection:

Facility Id: 31001415  
Code: 103  
Permit Number: P00002  
Inspection Type: Final

Facility Id: 31001415  
Code: 103  
Permit Number: P00001  
Inspection Type: Final

Tanks:

Tank ID: T00001  
**Tank Status:** **Removed**  
Tank Type: Steel  
Capacity: 550  
Content: Gasoline  
CAS #: 8006-61-9  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: Not reported  
Date Removed: 7/18/1995  
Date Last Used: 11/1/1991  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Bare Steel  
Piping Type: Suction: no valve at tank  
Release Detection on Piping: Not reported

Tank ID: T00002  
**Tank Status:** **Removed**  
Tank Type: Other  
Capacity: 2000  
Content: Heating Oil  
CAS #: 68476-30-2  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: Not reported  
Date Removed: 7/18/1995  
Date Last Used: 7/18/1995  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**KNOWLTON MFG. (Continued)**

**U004094503**

Piping Material: Unknown  
Piping Type: Not reported  
Release Detection on Piping: Not reported

**C8**  
**NE**  
**1/4-1/2**  
**0.330 mi.**  
**1744 ft.**

**PUBLIC WORKS BUILDING**  
**3001 HARRIS AVE**  
**NORWOOD, OH 45212**

**Site 1 of 2 in cluster C**

**OH LUST**  
**OH UST**  
**OH ARCHIVE UST**

**U003975327**  
**N/A**

**Relative:**  
**Lower**

**LUST:**

Release Number: 31009465-N00001  
Release Date: Not reported  
**Facility Status: Inactive**  
LTF Status: 6 Closure of regulated UST  
**FR Status: NFA: No Further Action**  
Priority: 3  
Review Date: 06/20/2000  
Class: Viable Responsible Party has been identified

**Actual:**  
**567 ft.**

**UST:**

Facility Id: 31009465  
Facility Type: Government  
Owner Name: CITY OF NORWOOD  
Owner Address: 4645 MONTGOMERY RD  
Owner City/State/Zip: 45212  
  
Tank Number: T00003  
Status: CIU - Currently In Use  
UST Capacity: 6000  
Tank Content: Gasoline  
Installation Date: 02/19/1997  
Construction: FRP-Fiberglass Reinforced Plastic

Tank Number: T00004  
Status: CIU - Currently In Use  
UST Capacity: 6000  
Tank Content: Diesel  
Installation Date: 02/19/1997  
Construction: FRP-Fiberglass Reinforced Plastic

**ARCHIVE UST:**

Facility Number: 31009465

**Permit:**

Facility Id: 31009465  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 2/18/1997  
Lfd Permit Id: Not reported

Facility Id: 31009465  
Permit Id: P00002  
Permit Status: Expired  
Issued Date: 3/14/1997

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**PUBLIC WORKS BUILDING (Continued)**

**U003975327**

Lfd Permit Id: Not reported

Inspection:

Facility Id: 31009465  
Code: 103  
Permit Number: P00001  
Inspection Type: Final

Facility Id: 31009465  
Code: 303  
Permit Number: P00002  
Inspection Type: Final

Tanks:

Tank ID: T00001  
**Tank Status:** **Removed**  
Tank Type: Fiberglass Reinforced Plastic  
Capacity: 4000  
Content: Diesel  
CAS #: 68334-30-5  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: Not reported  
Date Removed: 2/7/1997  
Date Last Used: 2/7/1997  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Galvanized Steel  
Piping Type: Not reported  
Release Detection on Piping: Not reported

Tank ID: T00002  
**Tank Status:** **Removed**  
Tank Type: Other  
Capacity: 8000  
Content: Gasoline  
CAS #: 8006-61-9  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: Not reported  
Date Removed: 2/7/1997  
Date Last Used: 2/7/1997  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Galvanized Steel  
Piping Type: Not reported  
Release Detection on Piping: Not reported

Tank ID: T00003  
**Tank Status:** **Currently In Use**

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**PUBLIC WORKS BUILDING (Continued)**

**U003975327**

Tank Type: Fiberglass Reinforced Plastic  
Capacity: 6000  
Content: Gasoline  
CAS #: 8006-61-9  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 2/19/1997  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: None Required  
Release Detection on Tank: Automatic Tank Gauging  
Corrosion Protection Piping: None Required  
Piping Material: Double Walled  
Piping Type: Suction: valve at dispenser  
Release Detection on Piping: No Monitoring Suction/Gravity System

Tank ID: T00004  
**Tank Status: Currently In Use**  
Tank Type: Double Walled Fiberglass  
Capacity: 6000  
Content: Diesel  
CAS #: 68334-30-5  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 2/19/1997  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: None Required  
Release Detection on Tank: Automatic Tank Gauging  
Corrosion Protection Piping: None Required  
Piping Material: Double Walled  
Piping Type: Suction: valve at dispenser  
Release Detection on Piping: No Monitoring Suction/Gravity System

**C9**  
**NE**  
**1/4-1/2**  
**0.331 mi.**  
**1749 ft.**

**FEDERAL EXPRESS CORPORATION**  
**3004 HARRIS AVE**  
**NORWOOD, OH 45212**  
**Site 2 of 2 in cluster C**

**OH LUST** **U004090227**  
**OH ARCHIVE UST** **N/A**

**Relative:**  
**Lower**

**LUST:**  
Release Number: 31003236-N00001  
Release Date: Not reported  
**Facility Status: Inactive**  
LTF Status: 6 Closure of regulated UST  
**FR Status: NFA: No Further Action**  
Priority: 3  
Review Date: 06/20/2000  
Class: Viable Responsible Party has been identified

**Actual:**  
**566 ft.**

**ARCHIVE UST:**  
Facility Number: 31003236

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**FEDERAL EXPRESS CORPORATION (Continued)**

**U004090227**

Permit:

Facility Id: 31003236  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 11/26/1993  
Lfd Permit Id: Not reported

Inspection:

Facility Id: 31003236  
Code: 101  
Permit Number: P00001  
Inspection Type: Final

Tanks:

Tank ID: T00001  
**Tank Status:** **Removed**  
Tank Type: Fiberglass Reinforced Plastic  
Capacity: 10000  
Content: Gasoline  
CAS #: 8006-61-9  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: 1/1/1984  
Date Removed: 10/21/1993  
Date Last Used: 10/21/1993  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Fiberglass Reinforced Plastic  
Piping Type: Suction: no valve at tank  
Release Detection on Piping: Not reported

Tank ID: T00002  
**Tank Status:** **Removed**  
Tank Type: Fiberglass Reinforced Plastic  
Capacity: 1000  
Content: Diesel  
CAS #: 68334-30-5  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: 1/1/1984  
Date Removed: 10/21/1993  
Date Last Used: 10/21/1993  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Fiberglass Reinforced Plastic  
Piping Type: Suction: no valve at tank  
Release Detection on Piping: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

10  
SW  
1/4-1/2  
0.348 mi.  
1837 ft.

**UNITED DAIRY FARMERS #075**  
**4344 SMITH RD**  
**CINCINNATI, OH 45212**

**OH LUST**  
**OH UST**  
**OH ARCHIVE UST**

**U000892267**  
**N/A**

**Relative:**  
**Higher**

**LUST:**

**Actual:**  
**630 ft.**

Release Number: 31000457-N00002  
Release Date: 05/10/2012  
**Facility Status: Active**  
LTF Status: 1 SUS/CON from regulated UST  
**FR Status: T1I: Tier 1 Investigation**  
Priority: 2  
Review Date: 10/22/2012  
Class: Viable Responsible Party has been identified

**UST:**

Facility Id: 31000457  
Facility Type: Gas Station  
Owner Name: UNITED DAIRY FARMERS  
Owner Address: 3955 MONTGOMERY RD  
Owner City/State/Zip: 45212  
  
Tank Number: T00001  
Status: CIU - Currently In Use  
UST Capacity: 10000  
Tank Content: Gasoline  
Installation Date: 06/01/1984  
Construction: FRP-Fiberglass Reinforced Plastic

Tank Number: T00002  
Status: CIU - Currently In Use  
UST Capacity: 10000  
Tank Content: Gasoline  
Installation Date: 06/01/1984  
Construction: FRP-Fiberglass Reinforced Plastic

**ARCHIVE UST:**

Facility Number: 31000457

**Permit:**

Facility Id: 31000457  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 1/12/1994  
Lfd Permit Id: Not reported

Facility Id: 31000457  
Permit Id: P00002  
Permit Status: Closed  
Issued Date: 6/20/2000  
Lfd Permit Id: Not reported

**Inspection:**

Facility Id: 31000457  
Code: 302  
Permit Number: P00002

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**UNITED DAIRY FARMERS #075 (Continued)**

**U000892267**

Inspection Type: Final

Facility Id: 31000457  
Code: 302  
Permit Number: P00001  
Inspection Type: Preliminary

Facility Id: 31000457  
Code: 302  
Permit Number: P00001  
Inspection Type: Preliminary

**Tanks:**

Tank ID: T00001  
**Tank Status:** **Currently In Use**  
Tank Type: Fiberglass Reinforced Plastic  
Capacity: 10000  
Content: Gasoline  
CAS #: 8006-61-9  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 6/1/1984  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: None Required  
Release Detection on Tank: Automatic Tank Gauging  
Corrosion Protection Piping: None Required  
Piping Material: Fiberglass Reinforced Plastic  
Piping Type: Pressure  
Release Detection on Piping: Electronic Line Leak Detector

Tank ID: T00002  
**Tank Status:** **Currently In Use**  
Tank Type: Fiberglass Reinforced Plastic  
Capacity: 10000  
Content: Gasoline  
CAS #: 8006-61-9  
Regulated: Yes  
Overfill Device Installed: Yes  
Spill Device Installed: Yes  
Installation Date: 6/1/1984  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: None Required  
Release Detection on Tank: Automatic Tank Gauging  
Corrosion Protection Piping: None Required  
Piping Material: Fiberglass Reinforced Plastic  
Piping Type: Pressure  
Release Detection on Piping: Electronic Line Leak Detector

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

11  
North  
1/4-1/2  
0.365 mi.  
1929 ft.

**SHEPHERD CHEMICAL CO, NORWOOD**  
**4900 BEECH ST**  
**NORWOOD, OH 45212**

**OH DERR**  
**OH SPILLS**

**S106958329**  
**N/A**

**Relative:**  
**Lower**

**DERR:**

DERR ID: 531000968  
District: SWDO  
Alias: Not reported  
Lat/Long: 39.1655 -84.4336  
EPA ID: Not reported  
**Program: Not reported**

**Actual:**  
**620 ft.**

**SPILLS:**

Spill No.: 9204-31-1322  
Spill Year: 1992  
Date Spill Reported: 04/10/1992  
Spill Month: 4  
Spill Number: 1322  
Reporter Name: FD  
Confidential: No  
District Code: SW  
Employee Number: Not reported  
Lat/Long: Not reported  
Product Spilled Name: NOX

Spill No.: 1305-31-1162  
Spill Year: 2013  
Date Spill Reported: 05/29/2013  
Spill Month: 5  
Spill Number: 1162  
Reporter Name: LYNN BARTLETT  
Confidential: Not reported  
District Code: SW  
Employee Number: Not reported  
Lat/Long: Not reported  
Product Spilled Name: UNISOL LIQUID RED

D12  
NNW  
1/4-1/2  
0.377 mi.  
1993 ft.

**KLEIMAN AUTO BODY INC**  
**2506 NORWOOD AVE**  
**NORWOOD, OH 45212**

**OH LUST**

**U004094475**  
**N/A**

**Site 1 of 2 in cluster D**

**Relative:**  
**Higher**

**LUST:**

Release Number: 31010248-N00001  
Release Date: 10/18/1993  
**Facility Status: Active**  
LTF Status: 1 SUS/CON from regulated UST  
**FR Status: SUS: a suspected release or source is identified**  
Priority: 2  
Review Date: 03/31/2011  
Class: Responsible Party for release has not yet been determined

**Actual:**  
**622 ft.**

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

EDR ID Number  
EPA ID Number

D13  
NNW  
1/4-1/2  
0.380 mi.  
2009 ft.

DEE SIGN CO  
2501 NORWOOD  
CINCINNATI, OH 45212

CERC-NFRAP  
RCRA NonGen / NLR  
OH DERR

1000131838  
OHD041593427

Site 2 of 2 in cluster D

Relative:  
Higher

CERC-NFRAP:

Site ID: 0504329  
Federal Facility: Not a Federal Facility  
NPL Status: Not on the NPL  
Non NPL Status: NFRAP-Site does not qualify for the NPL based on existing information

Actual:  
623 ft.

CERCLIS-NFRAP Assessment History:

Action: DISCOVERY  
Date Started: / /  
Date Completed: 06/01/81  
Priority Level: Not reported

Action: ARCHIVE SITE  
Date Started: / /  
Date Completed: 09/01/84  
Priority Level: Not reported

Action: PRELIMINARY ASSESSMENT  
Date Started: / /  
Date Completed: 09/01/84  
Priority Level: NFRAP-Site does not qualify for the NPL based on existing information

RCRA NonGen / NLR:

Date form received by agency: 09/15/1998  
Facility name: KDM SIGNS  
Facility address: 2501 NORWOOD AVE  
CINCINNATI, OH 452122725  
EPA ID: OHD041593427  
Contact: MICHELLE RINEHART  
Contact address: 2501 NORWOOD AVE  
CINCINNATI, OH 452122725  
Contact country: US  
Contact telephone: (513) 351-1733  
Contact email: Not reported  
EPA Region: 05  
Land type: Private  
Classification: Non-Generator  
Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: NAME NOT REPORTED  
Owner/operator address: ADDRESS NOT REPORTED  
CITY NOT REPORTED, AK 99998  
Owner/operator country: Not reported  
Owner/operator telephone: (312) 555-1212  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Owner/operator name: KISSEL WILLIAM A  
Owner/operator address: 2501 NOWOOD AVE

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DEE SIGN CO (Continued)

1000131838

CINCINNATI, OH 45212

Owner/operator country: Not reported  
Owner/operator telephone: (513) 351-1733  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
Used oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

Historical Generators:

Date form received by agency: 02/24/1992  
Facility name: KDM SIGNS  
Site name: DEE SIGN COMPANY  
Classification: Large Quantity Generator

Hazardous Waste Summary:

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Waste code: F003  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Waste code: F005  
Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE,

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

DEE SIGN CO (Continued)

1000131838

2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Violation Status: No violations found

Evaluation Action Summary:

Evaluation date: 03/11/1988  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 03/11/1988  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

DERR:

DERR ID: 531000221  
District: SWDO  
Alias: Not reported  
Lat/Long: 39.1636 -84.4447  
EPA ID: OHD041593427  
Program: Site Assessment

14  
NW  
1/4-1/2  
0.390 mi.  
2057 ft.

THE C.W. ZUMBIEL CO  
2339 HARRIS AVE  
NORWOOD, OH 45212

OH LUST U004102343  
OH ARCHIVE UST N/A

Relative:  
Lower

LUST:

Release Number: 31009853-N00001  
Release Date: Not reported  
Facility Status: Inactive  
LTF Status: 6 Closure of regulated UST  
FR Status: NFA: No Further Action  
Priority: 3  
Review Date: 06/20/2000  
Class: Viable Responsible Party has been identified

Actual:  
619 ft.

ARCHIVE UST:

Facility Number: 31009853

Permit:

Facility Id: 31009853  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 10/26/1999  
Lfd Permit Id: Not reported

Facility Id: 31009853  
Permit Id: P00001  
Permit Status: Expired